

THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

HIDDEN HILLS MANAGEMENT, LLC,
and 334TH PLACE 2001, LLC,

Plaintiffs,

v.

AMTAX HOLDINGS 114, LLC, and
AMTAX HOLDINGS 169, LLC

Defendants.

No. 3:17-cv-06048-RBL

[PROPOSED] PRETRIAL ORDER

AMTAX HOLDINGS 114, LLC, AMTAX
HOLDINGS 169, and PARKWAY
APARTMENTS, LP

Counter-Plaintiffs,

v.

HIDDEN HILLS MANAGEMENT, LLC,
and 334TH PLACE 2001, LLC

Counter-Defendants.

Pursuant to Local Rule 16, Plaintiffs and Counter-Defendants Hidden Hills Management, LLC (“HHM”) and 334th Place 2001, LLC (“334th Place” and, collectively with HHM, the “General Partners”) and Defendants and Counter-Plaintiffs AMTAX Holdings 114, LLC (“AMTAX 114”) and AMTAX Holdings 169, LLC (“AMTAX 169” and, collectively with AMTAX 114, the “Limited Partners”) (collectively, the “Parties”) provide the following proposed Pretrial Order.

I. FEDERAL JURISDICTION

Jurisdiction is vested in this court by virtue of complete diversity among the parties and an amount in controversy that exceeds \$75,000, exclusive of interest and costs. 28 U.S.C. § 1332(a).

II. CLAIMS FOR RELIEF AND AFFIRMATIVE DEFENSES

HHM and 334th Place intend to pursue the following claims for relief and affirmative defenses:

1. AMTAX 114 has confirmed, through its statement of claims below, that it is no longer pursuing its First and Second Counterclaims for Relief: Breach of Contract and Breach of Fiduciary Duty. It has dropped those claims because it cannot establish damages beyond that which it will already receive through this Court’s rulings on its Third and Fifth Counterclaims for Relief pursuant to the Court’s Order on Motions for Summary Judgment. (Dkt. #89). AMTAX 114 has also not asserted any derivative claims for damages on behalf of the Hidden Hills Partnership. As a result, AMTAX 114’s First and Second Counterclaims should be dismissed.

2. HHM has a right under the limited partnership agreement (“LPA”) of Hidden Hills 2001, LP (the “Hidden Hills Partnership”) to buy out the limited partner through the exercise of its option. Section 7.4.J sets forth an appraisal process that is used to determine the “Option Price” at which HHM can exercise its buyout option. On May 2, 2019, this Court ruled that under Section 7.4.J. the appraisal process used to set the Option Price was “tainted . . . as a

1 matter of law” (Order at 15). The Court further stated that “[t]he corrective for the tainted
2 appraisal may be as simple as re-doing the appraisal process. Or perhaps it damaged the
3 partnership in a way that will require HHM to compensate AMTAX.” (Order at 21).

4 3. Acceptance of the AMTAX Appraisal: In order to correct the appraisal process
5 and comply with the Court’s order, on May 7, 2019, HHM accepted the Cushman & Wakefield
6 (“C&W”) appraisal report solicited by AMTAX 114 as the basis for calculating the fair market
7 value of AMTAX 114’s Interest, which results in a buyout price of \$4,968,506. *See* Exhibit A
8 attached hereto. Acceptance of C&W’s appraisal should serve to set the buyout price and fairly
9 compensate AMTAX 114 for its interest.

10 4. Given AMTAX 114’s lack of any derivative claims on behalf of the Hidden Hills
11 Partnership and HHM’s acceptance of the C&W appraisal, AMTAX 114 cannot establish any
12 reasonable expectation of “economic detriment to the Partnership or the Project” that would
13 provide grounds for HHM’s removal under the Hidden Hills Partnership’s LPA. As a result,
14 HHM seeks a declaratory judgment that there is no basis for HHM to be removed as the general
15 partner of the Hidden Hills Partnership, and that HHM can finalize its exercised and enforceable
16 right to complete the buyout option under the Hidden Hills LPA at a price of \$4,968,506.

17 5. 334th Place also seeks to exercise its buyout right under the Parkway Limited
18 Partnership Agreement (“Parkway LPA”). 334th Place provided AMTAX 169 with an appraisal
19 for the purpose of setting the buyout price. AMTAX 169 has refused to provide an appraisal to
20 complete the process of establishing a buyout price. 334th Place seeks a declaratory judgment
21 requiring AMTAX 169 to provide a new appraisal that values the property as of the date of the
22 option exercise, or to require AMTAX 169 to utilize the appraisal it has obtained in the context
23 of this litigation so that 334th Place can finalize its exercised and enforceable right to complete
24 the buyout option under the Parkway LPA. Any third appraisal, if necessary, which sets the
25 buyout price, should similarly value the Parkway Apartments as of the date of the option
26 exercise. When 334th Place buys out the limited partner based on a final and binding appraisal

1 setting the buyout price when the process under the LPA is complete, AMTAX 169 will be made
2 whole for its interest based on the buyout price, plus any damages it proves in this matter.

3 6. 334th Place also seeks a declaration that there exists no basis in fact or law for
4 334th Place to be removed as the general partner of Parkway Apartments, LP (the “Parkway
5 Partnership”). AMTAX 169’s claim for a declaratory judgment for removal is barred because
6 AMTAX 169 cannot establish that removal would be warranted “based on breaches 334th
7 committed after its notice, or which AMTAX discovered before the buyout was complete.”
8 Order at 23. In addition, to the extent that AMTAX 169 establishes any breaches of the LPA or
9 fiduciary duty, its remedy should be limited to damages, not removal, which would make
10 AMTAX 169 whole.

11 7. AMTAX 114 and AMTAX 169’s counterclaims are barred by the doctrine of
12 unclean hands.

13 8. AMTAX 169’s counterclaims are barred, in whole or in part, by the doctrine of
14 waiver and/or estoppel.

15 9. AMTAX 169’s counterclaims are barred, in whole or in part, by the applicable
16 statute of limitations.

17 10. AMTAX 169’s counterclaims are barred by the business judgment rule.

18 *****

19 The Limited Partners intend to pursue the following claims for relief and affirmative defenses:

20 11. Having prevailed on its Third and Fifth Claims for Relief pursuant to the Court’s
21 Order on Motions for Summary Judgment (Dkt. # 89 (“Order”)), AMTAX 114 does not intend to
22 seek any damages at trial beyond those that have already been redressed by the Order. AMTAX
23 114 instead seeks at trial a declaratory judgment that (a) HHM has been removed as the Hidden
24 Hills Partnership’s Administrative General Partner, and is obliged to cooperate fully with the
25 transfer of Administrative General Partner responsibilities to AMTAX 114’s affiliate, Saugatuck,
26 LLC; and (b) HHM’s removal prevents it from purchasing AMTAX 114’s interest in the Hidden
Hills Partnership under Section 7.4J of the Hidden Hills LPA.

12. AMTAX 114 will establish at trial that it is entitled to remove HHM as the Administrative General Partner of the Hidden Hills Partnership based on (1) HHM's breaches of its contractual and fiduciary duties, including in connection with the "tainted" appraisal process (Order at 15), which could reasonably be expected to cause (and have caused) economic detriment to the Hidden Hills Partnership; and (2) HHM's failure to deliver a 2018 audited financial statement to AMTAX 114 as required by Section 12.1 of the Hidden Hills Partnership Agreement.

13. AMTAX 169 seeks a declaratory judgment that (a) 334th Place has been removed as the Parkway Partnership's Administrative General Partner, and is obliged to cooperate fully with the transfer of Administrative General Partner responsibilities to AMTAX 169's affiliate, Saugatuck, LLC; and (b) 334th Place's removal prevents it from purchasing AMTAX 169's interest in the Parkway Partnership under Section 7.4J of the Parkway LPA.

14. AMTAX 169 will establish at trial that it is entitled to remove 334th Place as the Administrative General Partner of the Parkway Partnership based on (1) 334th Place's multiple breaches of its contractual and fiduciary duties under the Parkway LPA, which could reasonably be expected to cause (and have caused) economic detriment to the Parkway Partnership; and (2) 334th Place's failure to deliver a 2018 audited financial statement to AMTAX 169 as required by Section 12.1 of the Parkway Partnership Agreement.

15. AMTAX 169 also seeks to recover derivative damages on behalf of the Parkway Partnership arising out of 334th Place's breaches of its fiduciary and contractual obligations under the Parkway LPA.

16. The Limited Partners also intend to establish the following affirmative defenses set forth in their Answer to Amended and Supplemented Complaint and Verified Counterclaims (Dkt. # 37):

- that the General Partners' affirmative declaratory judgment claims are barred by the doctrine of unclean hands as a result of the General Partners' efforts to improperly

1 and artificially reduce the option price that the General Partners were required to pay
2 to purchase the Limited Partners' interests in the Hidden Hills Partnership and the
3 Parkway Partnership pursuant to the Hidden Hills LPA and the Parkway LPA,
4 respectively (the "Option Price");

- 5 • that the General Partners' affirmative declaratory judgment claims are barred by the
- 6 terms of the Hidden Hills LPA and the Parkway LPA; and
- 7 • that the General Partners' affirmative declaratory judgment claims are barred by the
- 8 General Partners' prior breaches of the Hidden Hills LPA and the Parkway LPA.

9 **III. ADMITTED FACTS**

10 **Hidden Hills**

11 1. HHM and AMTAX 114 are parties to the Hidden Hills LPA, which governs the
12 Hidden Hills Partnership.

13 2. The Hidden Hills Partnership owns the Hidden Hills apartment complex.

14 3. The Compliance Period, as that term is defined in the Hidden Hills LPA, ended on
15 December 31, 2016.

16 **Parkway**

17 4. 334th Place and AMTAX 169 are parties to the Parkway LPA, which governs the
18 Parkway Partnership.

19 5. The Parkway Partnership is the owner of the Parkway apartment complex.

20 6. The Compliance Period, as that term is defined in the Parkway LPA, ended on
21 December 31, 2017.

22 7. 334th Place sent AMTAX 169 a letter dated January 3, 2018 pursuant to Section
23 7.4.J of the Parkway LPA, and selected Todd Henderson of CBRE to conduct an appraisal of the
24 Parkway apartment complex.

25 8. CBRE issued its report on February 5, 2018, valuing the apartment complex at
26 \$16,975,000.

2. Whether the Parkway Partnership is entitled to recover damages from 334th Place based on 334th Place's breaches of its contractual and fiduciary duties, and if so, the amount of those damages.

3. Whether the Limited Partners are entitled to remove the General Partners under Section 4.5(A)(iv)(2) of each partnership's LPA based on their breaches of contractual and fiduciary duties, thereby precluding the General Partners from consummating the exercise of their purchase options under Section 7.4J of each partnership's LPA.

4. Whether the General Partners' affirmative claims for relief are barred by the doctrine of unclean hands based on their breaches of contractual and fiduciary duties and abuses of authority, including their affirmative efforts to improperly and artificially reduce the Option Price.

V. WITNESSES

The names and addresses of all witnesses who may be called by HHM and 334th Place are:

Fact Witnesses

Catherine Tamaro
c/o Stoel Rives, LLP
600 University street Suite 3600
Seattle, WA 98101

Plaintiffs designate Ms. Tamaro as a witness who will testify. General nature of testimony: Catherine Tamaro is the representative of the general partner of each partnership at issue in this case. She will testify as to all of the matters at issue in this case within her knowledge, including but not limited to the formation of the partnerships at issue and the purchases of the apartment complexes, all aspects of the management of each partnership, the business relationship and communications between the general partners and the limited partners, her efforts on behalf of the general partners to exercise their buy out options under each partnership's LPA, and the limited partners' efforts to block that exercise.

1 Christopher Blake
2 c/o Boies, Schiller Flexner, LLP
3 725 S. Figueroa Street - 31st. Fl.
4 Los Angeles, CA 90017

5 Plaintiffs designate Mr. Blake as a witness who will testify. General nature of testimony:
6 Mr. Blake is the representative of the limited partner of each partnership at issue in this case. He
7 will testify as to all of the matters at issue in this case within his knowledge, including but not
8 limited to the business relationship and communications between the limited partners and the
9 general partners, the limited partners' efforts to block the exercise of the general partner's buy
10 out options under each partnership's LPA, and the purported grounds for removal of the general
11 partners.

12 Laura Lindal
13 c/o Lee Smart P.S., Inc.
14 1800 One Convention Place
15 701 Pike Street
16 Seattle, Washington 98101

17 Ms. Lindal may testify regarding the audited financial statements for the Hidden Hills
18 Partnership and the Parkway Partnership, and her decision to withdraw as the auditor for the
19 Hidden Hills Partnership and the Parkway Partnership.

20 Steven Arterberry
21 c/o Stoel Rives LLP
22 600 University street Suite 3600
23 Seattle, WA 98101

24 Mr. Arterberry may testify as to the work that he did at the Parkway apartment complex
25 and for the Parkway Partnership.

26 **Expert Witnesses**

27 Lorraine Barrick
28 c/o Stoel Rives LLP
29 600 University street Suite 3600
30 Seattle, WA 98101

31 Ms. Barrick will testify in accordance with the topics covered in her expert report.

The names and addresses of all witnesses who may be called by the Limited Partners are:

Fact Witnesses

Christopher Blake
c/o Boies, Schiller Flexner, LLP
725 S. Figueroa Street - 31st. Fl.
Los Angeles, CA 90017

The Limited Partners designate Mr. Blake as a witness who will testify. General nature of testimony: Mr. Blake is the representative of the Limited Partners. He will testify as to all of the matters at issue in this case within his knowledge, including but not limited to the business relationship and communications between the Limited Partners and the General Partners, the General Partners' efforts to improperly and artificially reduce the Option Price that the General Partners would have to pay to purchase the Limited Partners interests in the Hidden Hills Partnership and the Parkway Partnership, and the grounds for removal of the General Partners.

Catherine Tamaro
c/o Stoel Rives, LLP
600 University street Suite 3600
Seattle, WA 98101

The Limited Partners designate Ms Tamaro as a witness who will testify. General nature of testimony: Ms. Tamaro is the representative of the General Partners. She will testify as to all of the matters at issue in this case within her knowledge, including but not limited to the business relationship and communications between the Limited Partners and the General Partners, the General Partners' efforts to improperly and artificially reduce the Option Price that the General Partners would have to pay to purchase the Limited Partners interests in the Hidden Hills Partnership and the Parkway Partnership, and the grounds for removal of the General Partners.

Expert Witnesses

Jon Krabbenschmidt
c/o Boies, Schiller Flexner, LLP
725 S. Figueroa Street - 31st. Fl.
Los Angeles, CA 90017

1 Mr. Krabbenschmidt will testify in accordance with the topics covered in his expert
2 report.

3 **Possible Witnesses**

4 Cory Hutsell
5 Colliers International Valuation & Advisory Services
6 1325 4th Ave - Suite 1900

7 The Limited Partners designate Mr. Hutsell as a witness who may testify, either in person
8 or by deposition, regarding his interactions with the General Partners and his appraisal of the
9 Hidden Hills apartment complex.

10 Todd Henderson
11 c/o Amanda Robinson, Subpoena Counsel for CBRE
12 1800 Baltimore Ave - Suite 500
13 Kansas City, MI 64108

14 The Limited Partners designate Mr. Henderson as a witness who may testify, either in
15 person or by deposition, regarding his interactions with the General Partners and his appraisal of
16 the Hidden Hills apartment complex.

17 Brett Carp
18 Environmental Partners
19 1180 NW Maple Street, Suite 310
20 Issaquah, WA 98027

21 The Limited Partners designate Mr. Carp as a witness who may testify, either in person or
22 by deposition, regarding his interactions with HHM and EPI's work in connection with the
23 Hidden Hills apartment complex.

24 Laura Lindal
25 c/o Lee Smart P.S., Inc.
26 1800 One Convention Place
701 Pike Street
Seattle, Washington 98101

27 The Limited Partners designate Ms. Lindal as a witness who may testify at trial regarding
28 the audited financial statements for the Hidden Hills Partnership and the Parkway Partnership,
29 and her decision to withdraw as the auditor for the Hidden Hills Partnership and the Parkway
30 Partnership.

John Maddux
 c/o Lee Smart P.S., Inc.
 1800 One Convention Place
 701 Pike Street
 Seattle, Washington 98101

The Limited Partners designate Mr. Maddux as a witness who may testify at trial regarding accounting work he performed for the Hidden Hills Partnership and the Parkway Partnership, and communications he had with Catherine Tamaro and Laura Lindal regarding the Hidden Hills Partnership and the Parkway Partnership.

VI. EXHIBITS

The Parties' joint trial exhibit list is attached hereto as Exhibit B. The Parties each reserve their right to amend the exhibit list prior to trial.

Both parties expressly reserve the right to use and rely on trial exhibits designated by either party, even in the event that the designating party withdraws its designation.

VII. ACTION BY COURT

a. This case is scheduled for trial without a jury on June 3, 2019, at 9:30 a.m.

b. Trial briefs and proposed findings of fact and conclusions of law shall be filed with the Court on or before May 22, 2019.

This order has been approved by the Parties as evidenced by the signatures of their counsel. This order shall control the subsequent course of action unless modified by a subsequent order. This order shall not be amended except by order of the court pursuant to agreement of the parties or to prevent manifest injustice.

IT IS SO ORDERED.

DATED: _____, 2019

 The Honorable Ronald B. Leighton
 UNITED STATES DISTRICT COURT JUDGE

1 RESPECTFULLY SUBMITTED this 17th day of May, 2019.

2 **Stoel Rives LLP**

3 By: s/David R. Goodnight
4 David R. Goodnight, WSBA #20286
5 Rita V. Latsinova, WSBA #24447
6 J. Scott Pritchard, WSBA #50761
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13 *Attorneys for Plaintiffs and Counter-*
14 *Defendants Hidden Hills Management LLC*
15 *and 334th Place 2001, LLC*

16 **Perkins Coie LLP**

17 By: s/Steven D. Merriman
18 David J. Burman, WSBA #10611
19 Steven D. Merriman, WSBA #44035
20 1201 Third Avenue, Suite 4900
21 Seattle, WA 98101-3099
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24 SMerriman@perkinscoie.com

25 **Boies Schiller Flexner LLP**

26 Eric Pettit, admitted *pro hac vice*
Craig Bessenger, admitted *pro hac vice*
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cbessenger@bsflp.com
gzelfphin@bsflp.com

Attorneys for Defendants and Counter-
Plaintiffs AMTAX Holdings 114, LLC and
AMTAX Holdings 169, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of May, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following participants:

- **David J. Burman**
dburman@perkinscoie.com,docketsea@perkinscoie.com
- **Christopher G Caldwell**
ccaldwell@bsfllp.com,BSF_LAD_Records@BSFLLP.com
- **David R Goodnight**
DRGOODNIGHT@STOEL.COM,SEA_PS@stoel.com,docketclerk@stoel.com,jamie.dombek@stoel.com
- **Margarita V. Latsinova**
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- **Arwen Johnson**
ajohnson@bsfllp.com
- **Grayce S. Zelphin**
gzelphin@bsfllp.com

Dated May 17, 2019.

s/Cindy Castro
Cindy Castro, Legal Practice Assistant
Stoel Rives

Exhibit A

May 7, 2020

Mr. Chris Blake
Alden Torch Financial
1225 17th Street, Suite 1400
Denver, Colorado 80202

Via electronic mail and certified US Mail # 7018 0680 0001 2917 8695

Dear Mr. Blake:

Pursuant to Section 7.4.J of the Limited Partnership Agreement ("LPA"), Hidden Hills Management, LLC ("HHM") accepts the Cushman & Wakefield ("C&W") appraisal of \$19,700,000 solicited by AMTAX Holdings 114, LLC ("AMTAX 114"), as the basis for calculating the fair market value of the Interests of AMTAX 114 and Protech 2002-A, LLC ("Protech") in Hidden Hills 2001, LP ("Hidden Hills"). Pursuant to Sections 6.2B(ii) and 7.8D of the LPA, HHM's payment to AMTAX 114 and Protech will be \$4,968,506.

C&W's appraisal does not deduct any value associated with environmental contamination and therefore complies with the Court's directive that any binding appraisal "will be conducted ... without reference to EPI's various estimates."

It also gives AMTAX 114 the full value of its Interest based on its own appraisal. AMTAX 114's claimed damages pertain to an alleged diminution of its Interest as a result of the reduced property value reflected in the Colliers International Valuation and Advisory Services appraisal report. HHM's acceptance of C&W's appraisal to calculate AMTAX 114's Interest under Section 7.4.J cures any of AMTAX 114's alleged damages. HHM is not aware that AMTAX 114 asserted or developed any alternative damage theory or evidence, and AMTAX has not brought any derivative claims on behalf of Hidden Hills.

This letter is not intended to be a settlement proposal and it is fully admissible at trial.

Very truly yours,
HIDDEN HILLS MANAGEMENT, LLC



Catherine M. Tamaro

Exhibit B

Hidden Hills Management, 2001, LLC, et al. v. AMTAX Holdings 114, LLC, et al.

Case No. 3:17-cv-06048-RBL

JOINT TRIAL EXHIBIT LIST

| Trial Exh. No. | Depo Exh. No. | Deponent | Doc. Date | Document Description | Document No(s). | Plaintiffs' Objections | Defendants' Objections | Confidential Designation Waived | Admissible | Authentic | Dispute Authenticity and Admissibility |
|----------------|---------------|----------|------------|---|---|------------------------|---|---------------------------------|------------|-----------|--|
| 0001 | | | N/A | Draft 2019 Hidden Hills Audit Representation Letter | | | | X | | | X |
| 0002 | 12 | Noble | 2002.01.01 | Hidden Hills 2001, LP Amended and Restated Agreement of Limited Partnership | HHM-001951-2035 | | | X | X | X | |
| 0003 | 30 | Tamara | 2002.06.01 | Parkway Apartments, LP Amended and Restated Agreement of Limited Partnership | HHM-010611PW-93PW | | | X | X | X | |
| 0004 | 88 | Tamara | 2002.06.01 | Parkway Apartments, LP Development Agreement | AMTAXHH00042074-85 | | | X | X | X | |
| 0005 | | | 2002.06.02 | Excerpts of Parkway Private Activity Bond Application (Bond Docket I of II) | AMTAXHH00028909; AMTAXHH00028920; AMTAXHH00028956-58 AMTAXHH00031404 | | Relevance (FRE 401-403) Completeness (FRE 106) | X | | X | |
| 0006 | | | 2002.06.17 | Excerpt of Parkway Bond Docket II of II | AMTAXHH00031404 | | Relevance (FRE 401-403) Completeness (FRE 106) | X | | X | |
| 0007 | | | 2002.06.18 | Parkway Apartments, LP Deed of Trust and HUD Regulatory Agreement | AMTAXHH00028869-78 | | | X | X | X | |
| 0008 | | | 2002.06.20 | Parkway Apartments, Docket A | AMTAXHH00031350; AMTAXHH00031354; AMTAXHH00031356; AMTAXHH00031648; AMTAXHH00031665 | | Relevance (FRE 401-403) Completeness (FRE 106) | X | | X | |
| 0009 | | | 2002.08.19 | Parkway Apartments, LP Deed of Trust with Assignment of Rents | AMTAXHH00028853-68 | | | X | X | X | |
| 0010 | 13 | Noble | 2002.09.13 | Regulatory Agreement (Extended Use Agreement) | AMTAXHH00018870-927 | | | X | X | X | |
| 0011 | | | 2002.11.30 | 2002 Parkway REAC Filing | | | Relevance (FRE 401-403) | X | | X | |
| 0012 | | | 2002.11.30 | Parkway Audited Financial Statements for the Period June 20, 2002 (Inception) through November 30, 2002 | HHM-009942PW-969PW | | | X | X | X | |
| 0013 | 75 | Tamara | 2003.11.30 | Parkway Audited Financial Statements Year Ended November 30, 2003 | HHM-009970PW-98PW | | | X | X | X | |
| 0014 | | | 2003.11.30 | 2003 Parkway REAC Filing | | | Relevance (FRE 401-403) | X | | X | |
| 0015 | | | 2004.01.31 | 2002 Parkway Tax Filing | HHM-010988PW-HHM-011083PW | | | X | X | X | |
| 0016 | | | 2004.05.13 | REAC Physical Inspection Summary Report to Parkway LP | | | Relevance (FRE 401-403) | X | | X | |
| 0017 | 76 | Tamara | 2004.11.30 | Parkway Audited Financial Statements Year Ended November 30, 2004 | HHM-009999PW-10032PW | | | X | X | X | |
| 0018 | | | 2004.11.30 | 2004- Parkway REAC Filing | | | Relevance (FRE 401-403) | X | | X | |
| 0019 | | | 2005.02.18 | Parkway Apartments LIHTC Allocation Certificate (Form 8609) | AMTAXHH00027356-58 | | Relevance (FRE 401-403) | X | | X | |
| 0020 | | | 2005.06.13 | REAC Physical Inspection Summary Report to Parkway LP | | | Relevance (FRE 401-403) | X | | X | |
| 0021 | 79 | Tamara | 2005.11.30 | Parkway Audited Financial Statements Year Ended November 30, 2005 | HHM-010033PW-68PW | | | X | X | X | |
| 0022 | | | 2005.11.30 | 2005 Parkway REAC Filing | | | Relevance (FRE 401-403) | X | | X | |
| 0023 | | | 2006.03.28 | Stabilized Construction Monitoring Report - Parkway Apartments | AMTAXHH00027984 | | Relevance (FRE 401-403) | X | | X | |
| 0024 | | | 2006.08.02 | REAC Physical Inspection Summary Report to Parkway LP | | | Relevance (FRE 401-403) | X | | X | |
| 0025 | | | 2006.11.20 | Letter to Catherine Tamara from Hearthstone Housing Foundation | AMTAXHH00036003-005 | | | X | X | X | |
| 0026 | 80 | Tamara | 2006.11.30 | Parkway Audited Financial Statements Year Ended November 30, 2006 | HHM-010069PW-103PW | | | X | X | X | |
| 0027 | | | 2006.11.30 | 2006 Parkway REAC Filing | | | Relevance (FRE 401-403) | X | | X | |
| 0028 | 31 | Tamara | 2006.12.15 | Parkway Apartments, LP Amendment No. 1 to Amended and Restated Agreement of Limited Partnership | HHM-010548PW-59PW | | | X | X | X | |
| 0029 | 34 | Tamara | 2007.01.01 | Parkway Property Management Agreement | HHM-012037PW-53PW | | | X | X | X | |
| 0030 | | | 2007.09.21 | REAC Physical Inspection Summary Report to Trieste Holdings LLC | | | Relevance (FRE 401-403) | X | | X | |

| Trial Exh. No. | Depo Exh. No. | Deponent | Doc. Date | Document Description | Document No(s). | Plaintiffs' Objections | Defendants' Objections | Confidential Designation Waived | Admissible | Authentic | Dispute Authenticity and Admissibility |
|----------------|---------------|----------|------------|--|--|------------------------|-------------------------|---------------------------------|------------|-----------|--|
| 0031 | 32 | Tamara | 2007.11.15 | Parkway Apartments, LP Amendment No. 2 to Amended and Restated Agreement of Limited Partnership | HHM-010601PW-610PW | | | X | X | X | |
| 0032 | | | 2007.11.30 | 2007 Parkway REAC Filing | | | Relevance (FRE 401-403) | X | | X | |
| 0033 | 81 | Tamara | 2008.04.30 | Parkway Audited Financial Statements Year Ended November 30, 2007 | HHM-010104PW-140PW | | | X | X | X | |
| 0034 | | | 2008.09.17 | REAC Physical Inspection Summary Report to Parkway Apartments, LP | | | Relevance (FRE 401-403) | X | | X | |
| 0035 | 11 | Blake | 2009.03.03 | Parkway Audited Financial Statements for the Year Ended November 30, 2008 | HHM-010141PW-175PW | | | X | X | X | |
| 0036 | | | 2009.03.03 | 2008 Parkway REAC Filing | | | Relevance (FRE 401-403) | X | | X | |
| 0037 | | | 2009.10.20 | REAC Physical Inspection Summary Report to Parkway Apartments, LP | | | Relevance (FRE 401-403) | X | | X | |
| 0038 | 12 | Blake | 2009.11.30 | Parkway Audited Financial Statements for the Year Ended November 30, 2009 | HHM-010176PW-210PW | | | X | X | X | |
| 0039 | | | 2010.04.30 | April 2010 Parkway Apartments Rent Roll Report | AMTAXHH00039252-66 | | | X | X | X | |
| 0040 | 35 | Tamara | 2010.05.01 | Parkway Property Management Agreement | HHM-012070PW-85PW | | | X | X | X | |
| 0041 | | | 2010.12.03 | REAC Physical Inspection Summary Report to Parkway Apartments, LP | | | Relevance (FRE 401-403) | X | | X | |
| 0042 | | | 2010.12.31 | 2010 Parkway REAC Filing | | | Relevance (FRE 401-403) | X | | X | |
| 0043 | | | 2011.02.11 | Trieste Holdings, LLC General Contractor License | HHM-012143PW | | | X | X | X | |
| 0044 | | | 2011.03.04 | 2009 Parkway REAC Filing | | | Relevance (FRE 401-403) | X | | X | |
| 0045 | 13 | Blake | 2011.03.22 | Parkway Audited Financial Statements for the Period December 1, 2009 - December 31, 2010 | AMTAXHH00040220-56 | | | X | X | X | |
| 0046 | | | 2011.08.27 | June 30, 2011 Parkway Apartments Rent Roll Report | AMTAXHH00039329-44 | | | X | X | X | |
| 0047 | 14 | Blake | 2011.12.31 | Parkway Audited Financial Statements for the year Ended December 31, 2011 | HHM-010247PW-283PW | | | X | X | X | |
| 0048 | | | 2011.12.31 | 2011 Parkway REAC Filing | HHM-015908PW-928PW | | Relevance (FRE 401-403) | X | | X | |
| 0049 | 89 | Tamara | 2012.01.01 | Parkway Property Management Agreement | HHM-012054PW-69PW | | | X | X | X | |
| 0050 | | | 2012.03.30 | Property Condition Report for NPL Collateral Evaluation Process | AMTAXHH00027036-135 | | Relevance (FRE 401-403) | X | | X | |
| 0051 | | | 2012.03.31 | March 31, 2012 Parkway Apartments Rent Roll Report | AMTAXHH00038068-81 | | | X | X | X | |
| 0052 | | | 2012.04.27 | Novogradac Property Analysis of Parkway Apartments | AMTAXHH00043390-447 | | | X | X | X | |
| 0053 | 33 | Tamara | 2012.09.07 | Parkway Apartments, LP Amendment No 3 to the Amended and Restated Agreement of Limited Partnership | HHM-010597PW-600PW | | | X | X | X | |
| 0054 | 15 | Blake | 2012.12.31 | Parkway Audited Financial Statements for Years Ending December 31, 2011-12 | HHM-010284PW-323PW | | | X | X | X | |
| 0055 | | | 2012.12.31 | December 2012 Parkway Apartments Rent Roll Report | AMTAXHH00039014-28 | | | X | X | X | |
| 0056 | | | 2012.12.31 | 2012 Parkway REAC Filing | HHM-015929PW-941PW | | Relevance (FRE 401-403) | X | | X | |
| 0057 | | | 2013.02.08 | REAC Physical Inspection Summary Report to Parkway Apartments, LP | AMTAXHH00026708-725 | | | X | X | X | |
| 0058 | | | 2013.05.21 | Email Chain btwn CT and GN re Feb and Mar 2013 PW Rent Rolls w attch | AMTAXHH00025702-72 | | | X | X | X | |
| 0059 | 38 | Tamara | 2013.06.26 | Catherine Tamara E-mail to Gary Newbold | HHM-013068PW-96PW | | | X | X | X | |
| 0060 | 31 | Blake | 2013.06.27 | Gary Newbold E-mail to Catherine Tamara, copying Justin Rotondo | AMTAXHH00026208 | | | X | X | X | |
| 0061 | 25 | Blake | 2013.06.28 | Catherine Tamara E-mail to Gary Newbold | AMTAXHH00021624-26 | | | X | X | X | |
| 0062 | 40 | Tamara | 2013.06.30 | Rent Roll Report Trieste Holdings, LLC - Parkway Apartments | HHM-012808PW-22PW | | | X | X | X | |
| 0063 | | | 2013.07.23 | Gary Newbold E-mail to Justin Rotondo | AMTAXHH00025622-23 | | | X | X | X | |
| 0064 | 41 | Tamara | 2013.08.28 | Catherine Tamara E-mail to Gary Newbold | HHM-013482PW-83PW | | | X | X | X | |
| 0065 | | | 2013.11.30 | November 2013 Parkway Apartments Rent Roll | AMTAXHH00039712-731 | | | X | X | X | |
| 0066 | 42 | Tamara | 2013.12.20 | Catherine Tamara E-mail to Gary Newbold | HHM-013228PW-29PW | | | X | X | X | |
| 0067 | 16 | Blake | 2013.12.31 | Parkway Audited Financial Statements for Years Ending December 31, 2012-13 | AMTAXHH00027496-534 and HHM-010324PW-362PW | | | X | X | X | |
| 0068 | | | 2013.12.31 | 2013 Parkway REAC Filing | HHM-015942PW-952PW | | Relevance (FRE 401-403) | X | | X | |
| 0069 | | | 2013.12.31 | December 2013 Parkway Apartments Rent Roll | AMTAXHH00039611-625 | | | X | X | X | |
| 0070 | | | 2014.01.21 | Gary Newbold E-mail to Catherine Tamara and Chris Blake, copying Adam Stein | AMTAXHH00019168-72 | | | X | X | X | |

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|----------------|---------------|--------------------|------------|--|--|-------------------------|------------------------|---------------------------------|------------|-----------|--|
| 0071 | 47 | Tamara | 2014.02.03 | Catherine Tamara E-mail to Gary Newbold | HHM-012907PW-908PW | | | X | X | X | |
| 0072 | | | 2014.03.18 | Catherine Tamara E-mail to Chris Blake, copying Gary Newbold | AMTAXHH00020516-18 | | | X | X | X | |
| 0073 | 28 | Blake | 2014.03.27 | Gary Newbold E-mail to Chris Blake, copying John Thomas | AMTAXHH00022142-47 | | | X | X | X | |
| 0074 | | | 2014.03.27 | Gary Newbold E-mail to Chris Blake | AMTAXHH00020506-10 | | | X | X | X | |
| 0075 | 32 | Blake | 2014.03.28 | Gary Newbold E-mail to Christopher Blake | AMTAXHH00020477-78 | | | X | X | X | |
| 0076 | | | 2014.03.28 | Gary Newbold E-mail to Christopher Blake | AMTAXHH00024434 | | | X | X | X | |
| 0077 | 21 | Blake | 2014.04.22 | Catherine Tamara E-mail to Gary Newbold, copying John Thomas and Chris Blake | AMTAXHH00026658-675 | | | X | X | X | |
| 0078 | 22 | Blake | 2014.05.01 | Chris Blake E-mail to Catherine Tamara copying Gary Newbold and Adam Stein | AMTAXHH00026627-28 | | | X | X | X | |
| 0079 | 52 | Tamara | 2014.05.08 | Catherine Tamara E-mail to Gary Newbold | HHM-012901PW | | | X | X | X | |
| 0080 | | | 2014.05.08 | Catherine Tamara E-mail to Chris Blake | AMTAXHH00022892-895 | | | X | X | X | |
| 0081 | 91 | Tamara | 2014.05.15 | Project Capital Needs Assessment Report (PCNA) - Parkway Apartments | HHM-015717PW-53PW | | | X | X | X | |
| 0082 | 53 | Tamara | 2014.05.30 | Gary Newbold E-mail to Catherine Tamara | HHM-013540PW-41PW | | | X | X | X | |
| 0083 | | | 2014.05.31 | May 2014 Parkway Apartments Rent Roll | AMTAXHH00038609-623 | | | X | X | X | |
| 0084 | 54 | Tamara | 2014.06.02 | Gary Newbold Memo to File | HHM-013539PW | | | X | X | X | |
| 0085 | | | 2014.06.25 | Catherine Tamara E-mail to Gary Newbold | AMTAXHH00023850 | | | X | X | X | |
| 0086 | | | 2014.06.30 | June 2014 Parkway Apartments Rent Roll | AMTAXHH00038653-667 | | | X | X | X | |
| 0087 | | | 2014.07.23 | John Demboski E-mail to Gary Newbold and Catherine Tamara | HHM-012793PW | | | X | X | X | |
| 0088 | 140 | Tamara | 2014.07.25 | Bryan Barker E-mail to Catherine Tamara | HHM-002858-59 | | | X | X | X | |
| 0089 | | | 2014.08.14 | Andre Folse E-mail to Chris Blake and Rachel Brady, copying Gary Newbold and David Von Tilus | AMTAXHH00022421-24 | | | X | X | X | |
| 0090 | 10 | Blake (1-24-19 v2) | 2014.08.28 | Hunt Funding Request | AMTAXHH00023021-30 | | | X | X | X | |
| 0091 | | | 2014.08.29 | Gary Newbold E-mail to Susan Kwarciak and Bryan Townsend, copying Chris Blake | AMTAXHH00021788 | | | X | X | X | |
| 0092 | | | 2014.10.29 | Chris Blake E-mail to Gary Newbold | AMTAXHH00023255-56 | | | X | X | X | |
| 0093 | | | 2014.11.01 | Invoice | HHM-012220PW -221PW | Relevance (FRE 401-403) | | X | X | X | |
| 0094 | 58 | Tamara | 2014.11.13 | Gary Newbold E-mail to Catherine Tamara | HHM-013554PW-57PW | | | X | X | X | |
| 0095 | 17 | Blake | 2014.12.13 | Parkway Audited Financial Statements for Years Ending December 31, 2013-14 | AMTAXHH00027535-71 and HHM-010324PW-362PW | | | X | X | X | |
| 0096 | | | 2014.12.31 | 2014 Parkway REAC Filing | HHM-015953PW-964PW | Relevance (FRE 401-403) | | X | | X | |
| 0097 | | | 2014.12.31 | December 2014 Parkway Apartments Rent Roll | AMTAXHH00039800-813 | | | X | X | X | |
| 0098 | | | 2015.01.26 | Parkway Apartments 12.31.2014 Related Party Fees | AMTAXHH00027682 | | | X | X | X | |
| 0099 | | | 2015.01.31 | January 2015 Parkway Apartments Rent Roll | AMTAXHH00038433-447 | | | X | X | X | |
| 0100 | | | 2015.02.24 | Parkway Apartments, LP Deed of Trust with Assignment of Rents | AMTAXHH00023310-61 | | | X | X | X | |
| 0101 | | | 2015.02.24 | Parkway Apartments, LP HUD Regulatory Agreement | AMTAXHH00023362-99 | | | X | X | X | |
| 0102 | 60 | Tamara | 2015.04.28 | Catherine Tamara E-mail to Gary Newbold | HHM-012997PW-3000PW | | | X | X | X | |
| 0103 | | | 2015.05.11 | Gary Newbold E-mail to Catherine Tamara | AMTAXHH00025517 | | | X | X | X | |
| 0104 | | | 2015.05.28 | Gary Newbold E-mail to Bryan Townsend | AMTAXHH00023238-39 | | | X | X | X | |
| 0105 | | | 2015.06.30 | June 2015 Parkway Apartments Rent Roll | AMTAXHH00038668-682 | | | X | X | X | |
| 0106 | | | 2015.08.31 | August 2015 Parkway Apartments Rent Roll | AMTAXHH00038758-772 | | | X | X | X | |
| 0107 | 63 | Tamara | 2015.11.25 | Gary Newbold E-mail to Catherine Tamara | HHM-013750PW-52PW | | | X | X | X | |
| 0108 | | | 2015.12.15 | Real Property Petition to King County Board of Equalization | HHM-014734 PW-737PW | Relevance (FRE 401-403) | | X | | X | |
| 0109 | 18 | Blake | 2015.12.31 | Parkway Audited Financial Statements for Years Ending December 31, 2014-15 | N/A | | | X | X | X | |
| 0110 | | | 2015.12.31 | 2015 Parkway REAC Filing | HHM-015965PW-976PW | Relevance (FRE 401-403) | | X | | X | |
| 0111 | | | 2015.12.31 | December 2015 Parkway Apartments Rent Roll | AMTAXHH00038970-983 | | | X | X | X | |
| 0112 | | | 2016.02.08 | February 2016 Parkway Apartments Rent Roll | AMTAXHH00026174-187 | | | X | X | X | |
| 0113 | | | 2016.05.11 | WSHFC 2016 Inspection | AMTAXHH00027703-713 | | | X | X | X | |
| 0114 | | | 2016.10.31 | October 2016 Parkway Apartments Rent Roll Report | AMTAXHH00038877-890 | | | X | X | X | |
| 0115 | 19 | Blake | 2016.12.31 | Parkway Audited Financial Statements for the Years Ending December 31, 2015-16 | AMTAXHH00027594-637 and HHM-010363PW-406PW | | | X | X | X | |
| 0116 | | | 2016.12.31 | 2016 Parkway REAC Filing | HHM-015977PW-999PW | Relevance (FRE 401-403) | | X | | X | |

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|----------------|---------------|---------------------|------------|--|-------------------------------|------------------------|-------------------------|---------------------------------|------------|-----------|--|
| 0117 | | | 2016.12.31 | December 2016 Parkway Apartments Rent Roll Report | AMTAXHH00035787-800 | | | X | X | X | |
| 0118 | 114 | Tamara | 2017.01.09 | Andrew Nathenson E-mail to Catherine Tamara | HHM-001947 | | | X | X | X | |
| 0119 | 115 | Tamara | 2017.01.12 | Andrew Nathenson E-mail to Catherine Tamara | HHM-002048-49 | | | X | X | X | |
| 0120 | 5 | Blake (1-24-19 v.1) | 2017.03.14 | HHM Letter to AMTAX 114 | AMTAXHH00017535-36 | | | X | X | X | |
| 0121 | 120 | Tamara | 2017.03.23 | Email from Chris Blake to Catherine Tamara, copying Kori Gibbs | AMTAXHH00018937 | | | X | X | X | |
| 0122 | | | 2017.03.31 | March 2017 Parkway Apartments Rent Roll Report | AMTAXHH00035809-822 | | | X | X | X | |
| 0123 | | | 2017.05.31 | May 2017 Parkway Apartments Rent Roll Report | AMTAXHH00038198-211 | | | X | X | X | |
| 0124 | | | 2017.10.19 | REAC Physical Inspection Summary Report to Parkway Apartments | | | | X | X | X | |
| 0125 | 23 | Blake | 2017.12.13 | Caley Dias E-mail to Chris Blake, copying Ryan Trane | AMTAXHH00020525-26 | | | X | X | X | |
| 0126 | 20 | Blake | 2017.12.31 | Parkway Audited Financial Statements for the Years Ending December 31, 2016 - 17 | AMTAXHH00027638-679 | | | X | X | X | |
| 0127 | | | 2017.12.31 | 2017 Parkway REAC Filing | HHM-016000PW-024PW | | Relevance (FRE 401-403) | X | | X | |
| 0128 | 64 | Tamara | 2018.01.03 | 334th Place Letter to AMTAX 169 | HHM-014889PW | | | X | X | X | |
| 0129 | 7 | Blake | 2018.02.05 | CBRE Appraisal of Parkway | HHM-014086PW-212PW HHM-014087 | | | X | X | X | |
| 0130 | 90 | Tamara | 2018.02.13 | Parkway Audited Financial Statements for the Years Ended December 31, 2017-16 | HHM-010486PW-527PW | | | X | X | X | |
| 0131 | 4 | Blake | 2018.02.15 | 334th Place Letter to AMTAX 169 | N/A | | | X | X | X | |
| 0132 | 71 | Tamara | 2018.03.06 | AMTAX 169 Letter to 334th Place | HHM-012839PW-40PW | | | X | X | X | |
| 0133 | 6 | Blake | 2018.03.07 | 334th Place Letter to AMTAX 169 | N/A | | | X | X | X | |
| 0134 | | | 2018.04.30 | April 2018 Parkway Apartments Rent Roll Report | AMTAXHH00038184 | | | X | X | X | |
| 0135 | 93 | Tamara | 2018.05.08 | AMTAX 169 Letter to 334th Place | HHM-012846PW-49PW | | | X | X | X | |
| 0136 | 74 | Tamara | 2018.05.10 | Novogradac Appraisal Report of Parkway Apartments | AMTAXHH00043597-755 | | | X | X | X | |
| 0137 | | | 2018.05.31 | May 2018 Parkway Apartments Rent Roll Report | AMTAXHH00038212-225 | | | X | X | X | |
| 0138 | 1 | Blake | 2018.08.31 | Notice of Rule 30(b)(6) Deposition of Amtax Holdings 169, LLC | N/A | | | X | X | X | |
| 0139 | 77 | Tamara | 2018.09.24 | John Maddux Letter to Catherine Tamara | HHM-015007PW | | | X | X | X | |
| 0140 | | | 2018.12.31 | Hidden Hills - Trial Balance Detail | | | | X | X | X | |
| 0141 | | | 2018.12.31 | Hidden Hills 2001 LP - Trial Balance | | | | X | X | X | |
| 0142 | | | 2018.12.31 | Parkway Apartments Limited Partnership Trial Balance | | | | X | X | X | |
| 0143 | | | 2018.12.31 | Parkway Apartments Limited Partnership Trial Balance Detail | | | | X | X | X | |
| 0144 | 5 | Blake (1-24-19 v2) | 2019.01.23 | BSF Letter to Stoel Rives, with attachment | N/A | | | X | X | X | |
| 0145 | | | 2019.01.29 | Draft - Letter from Laura Lindal to Partners of Hidden Hills 2001 LP | | | | X | X | X | |
| 0146 | | | 2019.01.30 | Draft letter from Laura Lindal to the Partners of Parkway Apartments Limited Partnership | | | | X | X | X | |
| 0147 | | | 2019.01.31 | Draft - Hidden Hills 2001 LP a Washington Limited Partnership financial Statements and Supplementary Information as of and for the Years Ended December 31, 2018 and 2017 | | | | X | X | X | |
| 0148 | | | 2019.02.08 | Draft - Parkway Apartment Limited Partnership - HUD Project Number 127-11225 Financial Statements and Supplementary Information as of and for the Years Ended December 31, 2018 and 2017 | | | | X | X | X | |
| 0149 | 1 | Barrick | 2019.02.15 | Report of Lorraine Barrick | N/A | | | X | X | X | |
| 0150 | 2 | Barrick | 2019.02.15 | Schedules to Report of Lorraine Barrick | N/A | | | X | X | X | |
| 0151 | | | 2019.02.25 | Draft 2018 REAC filing | | | Relevance (FRE 401-403) | X | | X | |
| 0152 | | | 2019.03.08 | Parkway REAC filing acceptance | | | Relevance (FRE 401-403) | X | | X | |
| 0153 | | | 2019.05.03 | Laura Lindal Letter to Catherine Tamara re Hidden Hills withdrawal from audit | | | | X | X | X | |
| 0154 | | | 2019.05.03 | Laura Lindal Letter to Catherine Tamara re Parkway withdrawal from audit | | | | X | X | X | |
| 0155 | | | 2019.05.07 | HHM Letter to AMTAX 114 accepting C&W Appraisal | | | | X | X | X | |

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|----------------|---------------|----------|------------|---|-----------------------------------|------------------------|---|---------------------------------|------------|-----------|--|
| 0156 | | | 2019.05.09 | Letter to Eric Pettit from J. Scott Pritchard | | | | X | X | X | |
| 0157 | | | 2019.05.13 | Eric Pettit's letter to Scott Pritchard and Rita Latsinova | | | | X | X | X | |
| 0158 | | | 2019.05.14 | Alden Torch's Letter to Catherine Tamaro Hidden Hills Management, LLC | | | | X | X | X | |
| 0159 | | | 2019.05.14 | Email Chain between David Goodnight and Eric Pettit with attachments | | | | X | X | X | |
| 0160 | 43 | Tamaro | N/A | 2014 Report by Hunt | HHM-013230PW | | | X | X | X | |
| 0161 | 84 | Tamaro | N/A | Damages Schedule | AMTAXHH00043756 | | | X | X | X | |
| 0162 | | | | AMTAX 114 Initial Disclosures | | | | X | X | X | |
| 0163 | | | 2015.02.28 | Fourth Amendment to the Parkway LPA | HHM-016193PW- HHM-016200PW | | | X | X | X | |
| 0164 | | | | HUD Management Agent Handbook (Chapters 3 and 6) | | | Relevance (FRE 401-403) Completeness (FRE 106) | X | | X | |
| A0001 | --- | --- | 06/23/2000 | Additional Soil Characterization Report, prepared for: Hidden Hills Apartments Limited Partnership, June 23, 2000, prepared by: Thomas Morin, EPI (Attachment to CBRE_002733) | CBRE_002735 - CBRE_002752 | FRE 401, 402, 403 | | X | | X | |
| A0002 | 0021 | Noble | 01/01/2002 | Environmental Indemnity & ADA Compliance Agreement between Hidden Hills Management, LLC and AMTAX Holdings 114, LLC | AMTAXHH00016105 - AMTAXHH00016109 | FRE 401, 402, 403 | | X | | X | |
| A0003 | 0002 | Blake | 06/01/2002 | Parkway Apartments, LP Amended and Restated Agreement of Limited Partnership | AMTAXHH00021484 - AMTAXHH00021607 | | | X | X | X | |
| A0004 | 0086 | Tamaro | 09/30/2002 | Regulatory Agreement (Extended Use Agreement) between Washington State Housing Finance Commission and Parkway Apartments, LP | AMTAXHH00025242 - AMTAXHH00025297 | | | X | X | X | |
| A0005 | --- | --- | 12/01/2002 | Parkway Apartments, LP 2002 federal tax return | HHM-010988PW - HHM-011083PW | | | X | X | X | |
| A0006 | --- | --- | 01/16/2003 | Blume Loveridge & Co., PLLC Parkway Apartments Limited Partnership Financial Statements for the Period from June 20, 2002 (Inception) through November 30, 2002 | HHM-009942PW - HHM-009969PW | | | X | X | X | |
| A0007 | --- | --- | 12/01/2003 | Parkway Apartments, LP 2003 federal tax return | HHM-011145PW - HHM-011235PW | | | X | X | X | |
| A0008 | 0094 | Tamaro | 08/27/2004 | Amendment No. 1 to the Amended and Restated Agreement of Limited Partnership of Hidden Hills Management, LLC, Protech 2002-A, LLC and AMTAX Holdings 114, LLC | HHM-001399 - HHM-001407 | | | X | X | X | |
| A0009 | 0095 | Tamaro | 08/27/2004 | Amendment No. 2 to the Amended and Restated Agreement of Limited Partnership of Hidden Hills Management, LLC, Protech 2002-A, LLC and AMTAX Holdings 114, LLC | HHM-001396 - HHM-001398 | | | X | X | X | |
| A0010 | --- | --- | 12/01/2004 | Parkway Apartments, LP 2004 federal tax return | HHM-011084PW - HHM-011144PW | | | X | X | X | |
| A0011 | --- | --- | 12/01/2006 | Parkway Apartments, LP 2006 federal tax return | HHM-011404PW - HHM-011472PW | | | X | X | X | |
| A0012 | 0031 | Tamaro | 12/15/2006 | First Amendment to Amended and Restated Agreement of Limited Partnership of Parkway Apartments, LP | HHM-010548PW - HHM-010559PW | | | X | X | X | |
| A0013 | 0096 | Tamaro | 12/15/2006 | Third Amendment to Amended and Restated Agreement of Limited Partnership of Hidden Hills 2001, LP and among Hearthstone Housing Foundation, Protech 2002-A LLC, AMTAX Holdings 114, LLC, and Hidden Hills Management, LLC | HHM-001408 - HHM-001419 | | | X | X | X | |
| A0014 | --- | --- | 12/15/2006 | First Amendment to Amended and Restated Agreement of Limited Partnership of Parkway Apartments, LP | HHM-013699PW - HHM-013710PW | | | X | X | X | |
| A0015 | --- | --- | 09/14/2007 | Paul Loveridge memo to Catherine Tamaro re Parkway Apartments Limited Partnership - Distribution of enclosed 2005 federal return (Form 1065) for the fiscal year ended 11/30/2006 | HHM-011236PW - HHM-011295PW | | | X | X | X | |

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| A0016 | 0010 | Blake | 04/24/2008 | Loveridge Hunt & Co., PLLC Parkway Apartments Limited Partnership Financial Statements Year Ended November 30, 2007 | HHM-010104PW - HHM-010140PW | | | X | X | X | |
| A0017 | --- | --- | 05/27/2009 | Paul Loveridge memo to Catherine Tamaro re Parkway Apartments Limited Partnership - Distribution of enclosed 2007 federal return (Form 1065) for the fiscal year ended 11/30/2008 | HHM-011296PW - HHM-011366PW | | | X | X | X | |
| A0018 | --- | --- | 12/01/2009 | Parkway Apartments, LP 2009 federal tax return | HHM-011473PW - HHM-011540PW | | | X | X | X | |
| A0019 | --- | --- | 05/10/2011 | Paul Loveridge memo to Catherine Tamaro re Parkway Apartments Limited Partnership - Distribution of enclosed 2010 federal return (Form 1065) for the fiscal year ended 12/31/10 | HHM-011541PW - HHM-011615PW | | | X | X | X | |
| A0020 | --- | --- | 07/26/2012 | Gary Squires letter to Parkway Apartments, LP, enclosing 2011 federal tax return | HHM-011616PW - HHM-011687PW | | | X | X | X | |
| A0021 | 0097 | Tamaro | 09/07/2012 | Fourth Amendment to the Amended and Restated Agreement of Limited Partnership of Hidden Hills, LLP, and among Hearthstone Housing Foundation, Hidden Hills Management, LLC, AMTAX Holdings 114, and Protech 2002-A, LLC | AMTAXHH00016411 - AMTAXHH00016414 | | | X | X | X | |
| A0022 | --- | --- | 12/31/2012 | Parkway Apartments, LP 2012 federal tax return | HHM-011764PW - HHM-011835PW | | | X | X | X | |
| A0023 | --- | --- | 04/05/2013 | Catherine Tamaro email to John Maddux FW: Parkway Apartments - Management Certification - RESPONSE NEEDED BEFORE TRANSACTION WILL BE PROCESSED | SM00006494 - SM00006494 | | | X | X | X | |
| A0024 | --- | --- | 06/05/2013 | Gary Newbold email to Catherine Tamaro, Adam Stein, cc Alison Wadle RE: Hidden Hills and Parkway Refinancings | AMTAXHH00021622 - AMTAXHH00021623 | FRE 401, 402, 403 | | X | | X | |
| A0025 | 0037 | Tamaro | 06/06/2013 | Gary Newbold email to Catherine Tamaro, cc Justin Rotondo re Parkway 1st Q - Questions | HHM-012669PW - HHM-012669PW | | | X | X | X | |
| A0026 | 0039 | Tamaro | 06/26/2013 | Hidden Hills Apts. A/P Aging Summary | HHM-013070PW - HHM-013070PW | FRE 401, 402, 403 | | X | | X | |
| A0027 | 0087 | Tamaro | 06/26/2013 | Catherine Tamaro email to Gary Newbold, cc Justin Rotondo re Parkway 1st Q - Questions | HHM-013334PW - HHM-013334PW | | | X | X | X | |
| A0028 | --- | --- | 06/26/2013 | Parkway Apartments A/P | HHM-013335PW - HHM-013335PW | | | X | X | X | |
| A0029 | 0031 | Blake | 06/27/2013 | Gary Newbold email to Catherine Tamaro, cc Justin Rotondo re Parkway 1st Q - Questions | AMTAXHH00026208 - AMTAXHH00026209 | | | X | X | X | |
| A0030 | --- | --- | 07/03/2013 | Catherine Tamaro email to Gary Newbold Re: Parkway 1st Q - Questions | HHM-004832 - HHM-004834 | | | X | X | X | |
| A0031 | --- | --- | 07/10/2013 | Gary Newbold email to Catherine Tamaro, Amy Bleibel, cc Alison Wadle RE: Hidden Hills | AMTAXHH00021627 - AMTAXHH00021631 | | | X | X | X | |
| A0032 | 0029 | Blake | 07/10/2013 | Gary Newbold email to Catherine Tamaro re Parkway 1st Q - Questions | AMTAXHH00026444 - AMTAXHH00026446 | | | X | X | X | |
| A0033 | --- | --- | 07/12/2013 | Catherine Tamaro to Gary Newbold, Amy Bleibel, cc Alison Wadle RE: Hidden Hills | AMTAXHH00021632 - AMTAXHH00021636 | FRE 401, 402, 403 | | X | | X | |
| A0034 | -- | -- | 07/23/2013 | Gary Newbold email to Justin Rotondo re Hidden Hills | AMTAXHH00025622 - AMTAXHH00025623 | FRE 401, 402, 403, 602, 802 | | X | | X | |
| A0035 | 0035 | Blake | 12/20/2013 | Gary Newbold email to Catherine Tamaro, cc Adam Stein re Early buyout of Parkway | AMTAXHH00023912 - AMTAXHH00023912 | | | X | X | X | |
| A0036 | --- | --- | 12/31/2013 | Parkway Apartments, LP 2013 federal tax return | HHM-011688PW - HHM-011763PW | | | X | X | X | |
| A0037 | --- | --- | 12/31/2013 | Parkway Apartments, LP 2013 federal tax return (DRAFT) | HHM-012559PW - HHM-012632PW | | | X | X | X | |
| A0038 | 0030 | Blake | 01/09/2014 | Chris Blake email to Gary Newbold, cc Adam Stein re Early buyout of Parkway | AMTAXHH00023976 - AMTAXHH00023981 | | | X | X | X | |
| A0039 | 0044 | Tamaro | 01/22/2014 | Gary Newbold email to Catherine Tamaro re Early buyout of Parkway | HHM-012934PW - HHM-012938PW | | | X | X | X | |
| A0040 | 0046 | Tamaro | 01/25/2014 | Catherine Tamaro letter to Chris Blake, Adam Stein, and Gary Newbold re Parkway Apartments, Federal Way, Washington sent via electronic mail with enclosure | HHM-012796PW - HHM-012797PW | | | X | X | X | |

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| A0041 | --- | --- | 01/27/2014 | Catherine Tamaro email to Gary Newbold, Adam Stein, Chris Blake re Parkway Apartments early buyout, attaching 1/25/14 letter to Hunt with enclosure | AMTAXHH00021767 - AMTAXHH00021769 | | | X | X | X | |
| A0042 | --- | --- | 02/20/2014 | Catherine Tamaro letter to Chris Blake, Adam Stein, Gary Newbold re Parkway Apartments, Federal Way, Washington sent via electronic mail, attaching spreadsheet in compliance with Section 6.2(B) of the Partnership Agreement | AMTAXHH00022109 - AMTAXHH00022110 | | | X | X | X | |
| A0043 | 0048 | Tamaro | 03/03/2014 | Steven H. Arterberry, P.E.'s Invoice for Services for Parkway Apartments, LP | HHM-014598PW - HHM-014598PW | | | X | X | X | |
| A0044 | --- | --- | 03/08/2014 | Catherine Tamaro email to John Maddux +FW: Parkway | SM00006486 - SM00006487 | | | X | X | X | |
| A0045 | --- | --- | 03/08/2014 | Catherine Tamaro email to John Maddux Re: Parkway Apartments Limited Partnership Preliminary DRAFT Financial Statements | SM00007638 - SM00007640 | | | X | X | X | |
| A0046 | --- | --- | 03/18/2014 | Catherine Tamaro email to Chris Blake, cc Gary Newbold Re: Parkway Apartments early buyout | AMTAXHH00020516 - AMTAXHH00020518 | | | X | X | X | |
| A0047 | --- | --- | 03/27/2014 | Gary Newbold email to Chris Blake, cc John Thomas re Parkway Apartments early buyout | AMTAXHH00020500 - AMTAXHH00020505 | | | X | X | X | |
| A0048 | --- | --- | 03/27/2014 | Gary Newbold email to Chris Blake RE: Parkway Apartments early buyout | AMTAXHH00020506 - AMTAXHH00020510 | | | X | X | X | |
| A0049 | 0049 | Tamaro | 03/28/2014 | Gary Newbold email to Catherine Tamaro, cc John Thomas, Christ Blake re Parkway | HHM-012855PW - HHM-012857PW | | | X | X | X | |
| A0050 | 0050 | Tamaro | 03/28/2014 | Catherine Tamaro notes for response to Gary Newbold's email of 3/28/2014 | HHM-015013PW - HHM-015014PW | | | X | X | X | |
| A0051 | --- | --- | 04/02/2014 | Catherine Tamaro email to John Maddux FW: Parkway, attaching Parkway (10582) - 3rd Amend (SLP Transfer).pdf | SM00006479 - SM00006485 | | | X | X | X | |
| A0052 | --- | --- | 04/22/2014 | Catherine Tamaro's responses to Gary Newbold's 3/28/14 email | HHM-013711PW - HHM-013712PW | | | X | X | X | |
| A0053 | --- | --- | 04/24/2014 | Gary Newbold email to Chris Blake FW: Parkway, attaching 2013 Management Letter, LPA 1st Amendment, and notes re responses to Gary Newbold's 3/28/14 email | AMTAXHH00022593 - AMTAXHH00022611 | | | X | X | X | |
| A0054 | 0008 | Krabbenschmidt | 05/15/2014 | "Long Term" Replacement Reserve Analysis (Year 11 through Year 20) | HHM-015755PW - HHM-015759PW | | | X | X | X | |
| A0055 | 0053 | Tamaro | 05/30/2014 | Gary Newbold email to Catherine Tamaro re Parkway Apartments withdrawal from replacement reserve | HHM-013540PW - HHM-013541PW | | | X | X | X | |
| A0056 | 0056 | Tamaro | 07/24/2014 | Catherine Tamaro email to Gary Newbold re Parkway Apartments Reserve for Replacements Disbursement Request | HHM-013505PW - HHM-013506PW | | | X | X | X | |
| A0057 | --- | --- | 07/25/2014 | Catherine Tamaro email to Chris Blake, Gary Newbold, Adam Stein Re: Parkway Apartments, Federal Way, WA, attaching Financial Statement 07.01.14.xlsx (NATIVE) | AMTAXHH00022288 - AMTAXHH00022290 | | | X | X | X | |
| A0058 | --- | --- | 07/30/2014 | Catherine Tamaro email to Chris Blake Re: Parkway Apartments, Federal Way, WA | AMTAXHH00022284 - AMTAXHH00022287 | | | X | X | X | |
| A0059 | --- | --- | 10/06/2014 | Note from Catherine Tamaro re Section 7.4 of the Amended and Restated Agreement of Limited Partnership | HHM-004812 - HHM-004812 | | | X | X | X | |
| A0060 | --- | --- | 10/22/2014 | Catherine Tamaro email to Chris Blake, cc Gary Newbold FW: Hidden Hills liquidation calculation analysis with attachment | AMTAXHH00018048 - AMTAXHH00018049 | FRE 401, 402, 403 | | X | | X | |
| A0061 | 0057 | Tamaro | 11/12/2014 | Gary Newbold email to Catherine Tamaro, Chris Blake re Parkway Apartments, Federal Way, WA | HHM-013560PW - HHM-013561PW | | | X | X | X | |
| A0062 | --- | --- | 11/12/2014 | Gary Newbold email to Chris Blake FW: Parkway - Window Repairs and wet/rot areas | AMTAXHH00022583 - AMTAXHH00022584 | | | X | X | X | |
| A0063 | --- | --- | 12/31/2014 | Parkway Apartments, LP 2014 federal tax return | HHM-011836PW - HHM-011907PW | | | X | X | X | |
| A0064 | --- | --- | 02/18/2015 | Catherine Tamaro email to John Maddux Re: Parkway Apartments, LP 2014 DRAFT Financial Statements | SM00007677 - SM00007679 | | | X | X | X | |

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| A0065 | --- | --- | 02/19/2015 | Catherine Tamaro email to John Maddux Re: Parkway Apartments, LP 2014 DRAFT Financial Statements | SM00007156 - SM00007159 | | | X | X | X | |
| A0066 | --- | --- | 02/19/2015 | Catherine Tamaro email to John Maddux Re: Parkway Apartments, LP 2014 DRAFT Financial Statements | SM00007670 - SM00007672 | | | X | X | X | |
| A0067 | --- | --- | 02/20/2015 | Catherine Tamaro email to John Maddux re Parkway Related Party Transactions edit, attaching notes to financial statements | SM00007061 - SM00007062 | | | X | X | X | |
| A0068 | --- | --- | 04/03/2015 | Chris Blake email to Catherine Tamaro, cc Gary Newbold RE: Hidden Hills liquidation calculation, attaching Hidden Hills Historic & Profora NOI Analysis 2015 Update | HHM-002827 - HHM-002830 | FRE 401, 402, 403 | | X | | X | |
| A0069 | 0107 | Tamaro | 04/08/2015 | Catherine Tamaro email to Chris Blake, cc Gary Newbold re Hidden Hills liquidation calculation | HHM-004131 - HHM-004133 | FRE 401, 402, 403 | | X | | X | |
| A0070 | 0061 | Tamaro | 05/02/2015 | Steven H. Arterberry letter to WISHA Discrimination Investigations re Case No. 22967947; Paul Dienes v. Trieste Holdings | HHM-014599PW - HHM-014599PW | | | X | X | X | |
| A0071 | 0062 | Tamaro | 05/02/2015 | Steven Arterberry Billing Record for Parkway Apartments/Paul Dienes matter | HHM-014600PW - HHM-014600PW | | | X | X | X | |
| A0072 | 0003 | Henderson | 11/18/2015 | Catherine Tamaro email to Todd Henderson Re: tax statements | CBRE_002301 - CBRE_002303 | FRE 401, 402, 403 | | X | | X | |
| A0073 | --- | --- | 12/03/2015 | Catherine Tamaro email to Kailee Massey FW: Parkway and Hidden allocation of interest income | SM00013111 - SM00013112 | | | X | X | X | |
| A0074 | --- | --- | 12/31/2015 | Parkway Apartments, LP 2015 federal tax return | HHM-011908PW - HHM-011974PW | | | X | X | X | |
| A0075 | --- | --- | 01/12/2016 | Catherine Tamaro email to Kailee Massey Re: Parkway - May Rent | SM00013263 - SM00013263 | | | X | X | X | |
| A0076 | --- | --- | 01/13/2016 | Catherine Tamaro email to John Maddux Re: Our conversation today | SM00007600 - SM00007601 | | | X | X | X | |
| A0077 | 0108 | Tamaro | 01/19/2016 | Will Bennetts email to Catherine Tamaro re Hidden Hills Apartments | CBRE_001857 - CBRE_001862 | FRE 401, 402, 403 | | X | | X | |
| A0078 | --- | --- | 02/01/2016 | Catherine Tamaro email to Gary Squires Re: Parkway | SM00006223 - SM00006223 | | | X | X | X | |
| A0079 | 0006 | Henderson | 02/03/2016 | CBRE Appraisal of Hidden Hills Apartments | HHM-003630 - HHM-003794 | FRE 401, 402, 403 | | X | | X | |
| A0080 | --- | --- | 03/03/2016 | Hidden Hills Apartments Appraisal Report prepared by CBRE | CBRE_003329 - CBRE_003438 | FRE 401, 402, 403 | | X | | X | |
| A0081 | --- | --- | 03/18/2016 | Jeff Taylor email to Michael Koester FW: High Value Deals - Heritage Woods, Bryte Gardens, Hidden Hills, attaching Notes re Hidden Hills (10509) TB Review - Evaluation Period 2012-2014 | AMTAXHH00020911 - AMTAXHH00020913 | FRE 401, 402, 403 | | X | | X | |
| A0082 | --- | --- | 03/22/2016 | Squire Maddux & Company PLLC Parkway Apartments Limited Partnership Financial Statement and Supplementary Information for the Years Ended December 31, 2015 and 2014 | AMTAXHH00027572 - AMTAXHH00027593 | | | X | X | X | |
| A0083 | --- | --- | 03/22/2016 | Catherine Tamaro email to John Maddux Re: Parkway Apartments and ASC 205-40 | SM00007186 - SM00007187 | | | X | X | X | |
| A0084 | 0110 | Tamaro | 03/23/2016 | Todd Henderson email to Gene Williams re Value of LP Interest in Hidden Hills Apartments | CBRE_001832 - CBRE_001833 | FRE 401, 402, 403 | | X | | X | |
| A0085 | --- | --- | 06/10/2016 | Catherine Tamaro email to John Maddux FW: Parkway, attaching Profit and Loss | SM00006539 - SM00006544 | | | X | X | X | |
| A0086 | --- | --- | 08/10/2016 | Laura Lindal Parkway audit letter to Catherine Tamaro | LC00000068 - LC00000075 | | | X | X | X | |
| A0087 | --- | --- | 08/10/2016 | Laura Lindal Parkway REAC letter to Catherine Tamaro | LC00000078 - LC00000082 | | | X | X | X | |
| A0088 | --- | --- | 08/12/2016 | CBRE Appraisal of Hidden Hills Apartments (Attachment to HHM-001420) | HHM-001425 - HHM-001589 | FRE 401, 402, 403 | | X | | X | |
| A0089 | 0009 | Carp | 09/21/2016 | Hidden Hills 2001, LP Proposal for Phase I ESA Hidden Hills Apartments (Attachment to HHM-002936) | HHM-002938 - HHM-002947 | FRE 401, 402, 403 | | X | | X | |
| A0090 | 0144 | Tamaro | 10/04/2016 | Brett Carp email to Catherine Tamaro re Status Update - Hidden Hills 2001, LP | HHM-003014 - HHM-003014 | FRE 401, 402, 403 | | X | | X | |

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| A0091 | 0111 | Tamaro | 11/01/2016 | Brett Carp email to Catherine Tamaro re Draft Report | HHM-001372 - HHM-001372 | FRE 401, 402, 403 | | X | | X | |
| A0092 | 0014 | Carp | 11/03/2016 | Phase I Environmental Site Assessment Hidden Hills Apartments, prepared for Hidden Hills 2001, LP, prepared by EPI | HHM-000003 - HHM-000801 | FRE 401, 402, 403 | | X | | X | |
| A0093 | 0013 | Carp | 11/08/2016 | Brett Carp email to Catherine Tamaro Re: Cost Estimate | HHM-002473 - HHM-002474 | FRE 401, 402, 403 | | X | | X | |
| A0094 | --- | --- | 11/10/2016 | EPI Invoice 20161076 to Hidden Hills 2001 LP for professional services through 10/31/16 | EPI_732_00004021 - EPI_732_00004022 | FRE 401, 402, 403 | | X | | X | |
| A0095 | 0015 | Carp | 12/07/2016 | Catherine Tamaro email to Brett Carp Re: Hidden Hills Apartments - Phase I ESA Rpt | HHM-002559 - HHM-002560 | FRE 401, 402, 403 | | X | | X | |
| A0096 | 0018 | Carp | 12/21/2016 | EPI Table re Planning-Level Remediation Cost Estimate, Technical Memorandum, Hidden Hills Apartments | EPI_732_00004058 - EPI_732_00004058 | FRE 401, 402, 403 | | X | | X | |
| A0097 | --- | --- | 12/21/2016 | Brett Carp technical memo to Catherine Tamaro re Planning-Level Remediation Cost Estimate, Hidden Hills Apartments, EPI Project Number: 73201.1 | HHM-000802 - HHM-000887 | FRE 401, 402, 403 | | X | | X | |
| A0098 | 0016 | Carp | 12/21/2016 | Brett Carp email to Catherine Tamaro re Draft Tech Memo | HHM-001373 - HHM-001373 | FRE 401, 402, 403 | | X | | X | |
| A0099 | 0112 | Tamaro | 12/21/2016 | Brett Carp email to Catherine Tamaro re Draft Tech Memo | EPI_EML_00000025 - EPI_EML_00000025 | FRE 401, 402, 403 | | X | | X | |
| A0100 | --- | --- | 12/31/2016 | EPI Invoice 20161261 to Hidden Hills 2001 LP for professional services through 12/31/16 | EPI_732_00004023 - EPI_732_00004024 | FRE 401, 402, 403 | | X | | X | |
| A0101 | --- | --- | 12/31/2016 | Parkway Apartments, LP 2016 federal tax return | HHM-011975PW - HHM-012036PW | | | X | X | X | |
| A0102 | 0113 | Tamaro | 01/02/2017 | Catherine Tamaro email to Rodolfo Castillo, Jr re Hidden Hills Apartments with attachment (Attachment Not Included) | HHM-001375 - HHM-001375 | FRE 401, 402, 403, 106 | | X | | X | |
| A0103 | --- | --- | 01/02/2017 | Catherine Tamaro email to Brett Carp Re: Draft Tech Memo | HHM-002498 - HHM-002499 | FRE 401, 402, 403 | | X | | X | |
| A0104 | 0017 | Carp | 01/03/2017 | Brett Carp technical memo to Catherine Tamaro re Planning-Level Remediation Cost Estimate, Hidden Hills Apartments, EPI Project Number: 73201.1 | HHM-000888 - HHM-000973 | FRE 401, 402, 403 | | X | | X | |
| A0105 | 0116 | Tamaro | 01/19/2017 | Catherine Tamaro email to Todd Henderson re Hidden Hills | CBRE_000791 - CBRE_000792 | FRE 401, 402, 403 | | X | | X | |
| A0106 | 0118 | Tamaro | 01/30/2017 | Todd Henderson email to Colene Holzhauer re Appraisal of Hidden Hills | CBRE_004022 - CBRE_004025 | FRE 401, 402, 403 | | X | | X | |
| A0107 | --- | --- | 01/31/2017 | John Maddux email to Michael Koester, Laura Lindal, cc Keoni McGee RE: #10509 CHANGES NOTED BELOW | AMTAXHH00021227 - AMTAXHH00021230 | | | X | X | X | |
| A0108 | --- | --- | 01/31/2017 | Laura Lindal email to Catherine Tamaro Re: Alden Torch wants info re Parkway 2 | LC00000253 - LC00000258 | | | X | X | X | |
| A0109 | --- | --- | 02/16/2017 | Catherine Tamaro to Brett Carp Re: Status Update | HHM-003011 - HHM-003011 | FRE 401, 402, 403 | | X | | X | |
| A0110 | 0003 | Blake 1-24-19 v.1 | 03/08/2017 | AMTAX Holdings 114, LLC letter to Hidden Hills Management, LLC, Attn: Catherine Tamaro and Hearthstone Housing Foundation re Hidden Hills 2001, LP | AMTAXHH00017522 - AMTAXHH00017523 | FRE 401, 402, 403 | | X | | X | |
| A0111 | | | | Withdrawn (Duplicate) | | | | X | X | X | |
| A0112 | | | | Withdrawn (Duplicate) | | | | X | X | X | |
| A0113 | 0121 | Tamaro | 03/27/2017 | Catherine Tamaro email to Todd Henderson re Hidden Hills Apartments GP option to purchase | CBRE_002703 - CBRE_002703 | FRE 401, 402, 403 | | X | | X | |
| A0114 | 0122 | Tamaro | 03/27/2017 | Whitney Hauke email to Todd Henderson re Hidden Hills Apartments GP option to purchase | CBRE_002538 - CBRE_002539 | FRE 401, 402, 403 | | X | | X | |
| A0115 | --- | --- | 03/28/2017 | Skylar Audesirk email to Chris Blake, cc Jeff Kunitz, Emma Rufin, Hannah Sommers, Chris Vay re Valuation Proposal I Hidden Hills in Tacoma, WA, attaching 3/28/17 CBRE Hidden Hills Valuation Proposal | AMTAXHH00020533 - AMTAXHH00020540 | FRE 401, 402, 403 | | X | | X | |
| A0116 | 0123 | Tamaro | 03/30/2017 | Catherine Tamaro letter to Chris Blake re response to counter-proposals | HHM-004159 - HHM-004163 | FRE 401, 402, 403 | | X | | X | |
| A0117 | 0124 | Tamaro | 04/12/2017 | Chris Blake email to Catherine Tamaro re Response to March 30, 2017 letter | AMTAXHH00019525 - AMTAXHH00019527 | FRE 401, 402, 403 | | X | | X | |

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| A0118 | 0019 | Carp | 04/28/2017 | Catherine Tamaro email to Brett Carp re Status Update | HHM-003009 - HHM-003010 | FRE 401, 402, 403 | | X | | X | |
| A0119 | 0009 | Blake 1-24-19 v.1 | 05/04/2017 | Alison Wadle letter Hidden Hills Management, LLC, Attn: Catherine Tamaro re Hidden Hills LP | AMTAXHH00017533 - AMTAXHH00017534 | FRE 401, 402, 403 | | X | | X | |
| A0120 | | | | Withdrawn (Duplicate) | | | | X | X | X | |
| A0121 | 0006 | Noble | 05/05/2017 | Andy Noble email to Kori Gibbs, cc Farah Garcia, Cindy Van Natta re LIHTC Appraisal-University Place, WA attaching Hidden Hills Apartments appraisal | CW001564 - CW001752 | | | X | X | X | |
| A0122 | 0127 | Tamaro | 05/11/2017 | Chris Blake email to Catherine Tamaro, cc Alison Wadle re LIHTC Appraisal - University Place, WA | HHM-002058 - HHM-002058 | FRE 401, 402, 403 | | X | | X | |
| A0123 | 0020 | Henderson | 05/11/2017 | Todd Henderson proposal letter to Catherine Tamaro re Assignment Agreement, proposal specifications, and terms and conditions | CBRE_002622 - CBRE_002629 | FRE 401, 402, 403 | | X | | X | |
| A0124 | --- | --- | 05/11/2017 | Catherine Tamaro email to Todd Henderson Re: Hidden Hills appraisal update | CBRE_002644 - CBRE_002645 | FRE 401, 402, 403 | | X | | X | |
| A0125 | 0129 | Tamaro | 05/11/2017 | Timothy Flint email to Catherine Tamaro re Question about a property I own | HHM-002964 - HHM-002965 | FRE 401, 402, 403 | | X | | X | |
| A0126 | 0128 | Tamaro | 05/11/2017 | CBRE Engagement Letter for Second Appraisal of Hidden Hills Apartments | CBRE_002940 - CBRE_002947 | FRE 401, 402, 403 | | X | | X | |
| A0127 | 0130 | Tamaro | 05/12/2017 | Todd Henderson email to Colene Holzhauser re Hidden Hills appraisal update | CBRE_002513 - CBRE_002515 | FRE 401, 402, 403 | | X | | X | |
| A0128 | 0131 | Tamaro | 05/13/2017 | Catherine Tamaro email to Todd Henderson re Hidden Hills appraisal update | CBRE_002938 - CBRE_002939 | FRE 401, 402, 403 | | X | | X | |
| A0129 | 0002 | Flint | 05/14/2017 | Todd Henderson forward email to Colene Holzhauser re Hidden Hills appraisal update | CBRE_002547 - CBRE_002549 | FRE 401, 402, 403 | | X | | X | |
| A0130 | 0132 | Tamaro | 06/06/2017 | Andy Noble email to Catherine Tamaro re Hidden Hills Apartments low income housing fees | CW001132 - CW001134 | FRE 401, 402, 403 | | X | | X | |
| A0131 | 0133 | Tamaro | 06/06/2017 | Todd Henderson email to Colene Holzhauser re Hidden Hills | CBRE_002606 - CBRE_002607 | FRE 401, 402, 403 | | X | | X | |
| A0132 | 0025 | Noble | 06/07/2017 | CBRE Appraisal of Hidden Hills Apartments | CBRE_001660 - CBRE_001829 | FRE 401, 402, 403 | | X | | X | |
| A0133 | --- | --- | 06/07/2017 | Chris Blake email to Catherine Tamaro re Hidden Hills Appraisal | HHM-001944 - HHM-001944 | FRE 401, 402, 403 | | X | | X | |
| A0134 | 0005 | Flint | 06/08/2017 | CBRE Financial Analysis of Hidden Hills | HHM-002880 - HHM-002909 | FRE 401, 402, 403 | | X | | X | |
| A0135 | 0020 | Carp | 06/14/2017 | Brett Carp email to Catherine Tamaro re 73201 - Hidden Hills, Remediation Cost Estimate | EPI_EML_00000007 - EPI_EML_00000007 | FRE 401, 402, 403 | | X | | X | |
| A0136 | 0021 | Carp | 06/14/2017 | Brett Carp email to Tom Elsemore, cc Thom Morin re 73201 - Remediation Cost Estimate | EPI_EML_00000008 - EPI_EML_00000008 | FRE 401, 402, 403 | | X | | X | |
| A0137 | 0136 | Tamaro | 06/14/2017 | Thomas Morin email to Brett Carp re 73201 - Remediation Cost Estimate | EPI_EML_00001163 - EPI_EML_00001164 | FRE 401, 402, 403 | | X | | X | |
| A0138 | --- | --- | 06/14/2017 | Brett Carp email to Catherine Tamaro re 73201 - Hidden Hills, Remediation Cost Estimate | HHM-001269 - HHM-001269 | FRE 401, 402, 403 | | X | | X | |
| A0139 | 0023 | Carp | 06/15/2017 | Catherine Tamaro email to Brett Carp Re: 73201.1 - Email Authorization for Additional Services | EPI_EML_00001217 - EPI_EML_00001218 | FRE 401, 402, 403 | | X | | X | |
| A0140 | --- | --- | 06/19/2017 | Catherine Tamaro letter to Chris Blake | HHM-004167 - HHM-004167 | FRE 401, 402, 403 | | X | | X | |
| A0141 | 0026 | Henderson | 06/21/2017 | Catherine Tamaro email to Todd Henderson FW: LIHTC Appraisal - University Place, WA, attaching Hidden Hills Apartments FINAL.pdf (See CBRE_003834 for attachment) | CBRE_003833 - CBRE_003833 | FRE 401, 402, 403 | | X | | X | |
| A0142 | --- | --- | 06/21/2017 | Chris Blake email to Catherine Tamaro, cc Alison Wadle RE: LIHTC Appraisal- University Place, WA | HHM-002932 - HHM-002933 | FRE 401, 402, 403 | | X | | X | |
| A0143 | --- | --- | 06/27/2017 | Timothy Flint email to Chris Blake RE: Hidden Hills, attaching 6/8/17 Hidden Hills Valuation Proposal | AMTAXHH00019474 - AMTAXHH00019504 | FRE 401, 402, 403 | | X | | X | |
| A0144 | 0029 | Henderson | 06/28/2017 | Chris Blake email to Catherine Tamaro RE: LIHTC Appraisal- University Place, WA | HHM-002929 - HHM-002931 | FRE 401, 402, 403 | | X | | X | |
| A0145 | 0137 | Tamaro | 06/29/2017 | Timothy Flint email to Catherine Tamaro re Hidden Hills | HHM-002872 - HHM-002873 | FRE 401, 402, 403 | | X | | X | |
| A0146 | 0027 | Henderson | 06/30/2017 | Catherine Tamaro email to Todd Henderson re Short summary of the arsenic at Hidden Hills, attaching TPU Letter 1998.pdf; Environmental Partners Additional Soil Characterization.pdf (See CBRE_002735 for attachment) (First Attachment Not Included) | CBRE_002733 - CBRE_002733 | FRE 401, 402, 403 | | X | | X | |

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| A0147 | 0029 | Noble | 06/30/2017 | Todd Henderson email to Catherine Tamaro re Short summary of the arsenic at Hidden Hills | HHM-002979 - HHM-002980 | FRE 401, 402, 403 | | X | | X | |
| A0148 | --- | --- | 06/30/2017 | EPI Invoice 20170674 to Hidden Hills 2001, LP for professional services through 6/30/17 | EPI_732_00004025 - EPI_732_00004026 | FRE 401, 402, 403 | | X | | X | |
| A0149 | 0138 | Tamaro | 06/30/2017 | Todd Henderson email to Catherine Tamaro re Short summary of the arsenic at Hidden Hills | CBRE_002646 - CBRE_002647 | FRE 401, 402, 403 | | X | | X | |
| A0150 | 0142 | Tamaro | 07/06/2017 | Bryan Barker email to Catherine Tamaro, cc Andrew Nathenson RE: Hidden Hills | HHM-002870 - HHM-002871 | FRE 401, 402, 403 | | X | | X | |
| A0151 | --- | --- | 07/10/2017 | Timothy Flint email to Catherine Tamaro RE: Short summary of the arsenic at Hidden Hills | HHM-002976 - HHM-002978 | FRE 401, 402, 403 | | X | | X | |
| A0152 | 0139 | Tamaro | 07/11/2017 | Notes from conversation with Tim Flint | HHM-003628 - HHM-003629 | FRE 401, 402, 403 | | X | | X | |
| A0153 | --- | --- | 07/13/2017 | Chris Blake email to Timothy Flint re Hidden Hills | AMTAXHH00018935 - AMTAXHH00018935 | FRE 401, 402, 403 | | X | | X | |
| A0154 | 0143 | Tamaro | 07/17/2017 | Catherine Tamaro letter to Chris Blake in response to June 28, 2017 email re Environmental Partners, Inc. | HHM-004168 - HHM-004168 | FRE 401, 402, 403 | | X | | X | |
| A0155 | --- | --- | 07/18/2017 | Chris Blake email to Catherine Tamaro RE: LIHTC Appraisal- University Place, WA | AMTAXHH00020262 - AMTAXHH00020264 | FRE 401, 402, 403 | | X | | X | |
| A0156 | --- | --- | 07/18/2017 | Catherine Tamaro email to Chris Blake Re: LIHTC Appraisal- University Place, WA, attaching 7/17/17 Tamaro letter to Blake | AMTAXHH00020291 - AMTAXHH00020293 | FRE 401, 402, 403 | | X | | X | |
| A0157 | 0145 | Tamaro | 07/20/2017 | Catherine Tamaro email to Brett Carp re 73201.1 - Email Authorization for Additional Services | EPI_EML_00001202 - EPI_EML_00001203 | FRE 401, 402, 403 | | X | | X | |
| A0158 | -- | -- | 07/21/2017 | Saybr Contractors Planning Level Cost Estimate to Brett Carp | EPI_EML_00001627 | FRE 401, 402, 403 | | X | | X | |
| A0159 | --- | --- | 07/31/2017 | EPI Invoice 20170777 to Hidden Hills 2001, LP for professional services through 7/31/17 | EPI_732_00004027 - EPI_732_00004029 | FRE 401, 402, 403 | | X | | X | |
| A0160 | --- | --- | 08/02/2017 | Brett Carp email to Catherine Tamaro Re: 73201.1 - Email Authorization for Additional Services | EPI_EML_00001197 - EPI_EML_00001199 | FRE 401, 402, 403 | | X | | X | |
| A0161 | 0147 | Tamaro | 08/02/2017 | Catherine Tamaro email to Brett Carp re 73201.1 - Email Authorization for Additional Services | HHM-002237 - HHM-002239 | FRE 401, 402, 403 | | X | | X | |
| A0162 | --- | --- | 08/02/2017 | Eric Pettit letter to Catherine Tamaro re Hidden Hills 2001, LP in response to Tamaro's July 17, 2017 letter | HHM-003188 - HHM-003190+ | FRE 401, 402, 403 | | X | | X | |
| A0163 | 0148 | Tamaro | 08/03/2017 | Catherine Tamaro email to Brett Carp re 73201.1 - Draft Technical Memorandum | EPI_EML_00001192 - EPI_EML_00001192 | FRE 401, 402, 403 | | X | | X | |
| A0164 | 0141 | Tamaro | 08/04/2017 | Marsha Burns, Wells Fargo, letter to Hidden Hills 2001, LP, Catherine Tamaro, Managing Partner re Decline of Hidden Hills 2001, LP Refinance Request | COL00007482 - COL00007486 | FRE 401, 402, 403 | | X | | X | |
| A0165 | 0149 | Tamaro | 08/04/2017 | Catherine Tamaro email to Brett Carp Re: 73201.1 - Draft Technical Memorandum, attaching Confirmed and Suspected Contaminated Sites List-2.pdf | HHM-002229 - HHM-002230 | FRE 401, 402, 403 | | X | | X | |
| A0166 | 0030 | Carp | 08/07/2017 | Brett Carp email to Thom Morin re 73201.1 - Remediation Cost Estimate | EPI_EML_00000017 - EPI_EML_00000017 | FRE 401, 402, 403 | | X | | X | |
| A0167 | --- | --- | 08/07/2017 | Brett Carp email to Catherine Tamaro Re: 73201.1 - Tech Memo & Referrals | HHM-002259 - HHM-002261 | FRE 401, 402, 403 | | X | | X | |
| A0168 | --- | --- | 08/08/2017 | EPI Table re Order-of-Magnitude Remediation Cost Estimate, Technical Memorandum, Hidden Hills Apartments | EPI_732_00004147 - EPI_732_00004147 | FRE 401, 402, 403 | | X | | X | |
| A0169 | 0035 | Carp | 08/08/2017 | Brett Carp technical memo to Catherine Tamaro Re: Regulatory Pathway and Order-of-Magnitude Remediation Cost Estimate, EPI Project Number: 73201.1 | HHM-001059 - HHM-001146 | FRE 401, 402, 403 | | X | | X | |
| A0170 | 0150 | Tamaro | 08/11/2017 | Joseph McCarthy letter to Eric Pettit in response to August 2, 2017 letter re Hidden Hills 2001, LP | 3 pp. | FRE 401, 402, 403 | | X | | X | |
| A0171 | --- | --- | 08/31/2017 | EPI Invoice 20170888 to Hidden Hills 2001 LP for professional services through 8/31/17 | EPI_732_00004030 - EPI_732_00004031 | FRE 401, 402, 403 | | X | | X | |
| A0172 | 0031 | Henderson | 09/06/2017 | Todd Henderson email to Catherine Tamaro, cc Andy Noble re Hidden Hills 3rd Appraiser | CW000052 - CW000053 | FRE 401, 402, 403 | | X | | X | |

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|----------------|---------------|----------|------------|---|---|------------------------|------------------------|---------------------------------|------------|-----------|--|
| A0173 | --- | --- | 09/06/2017 | Catherine Tamaro email to Philip Assouad and Ryan Dinius re Hidden Hills Apartments, University Place, attaching Hidden Hills Apartments_Profit+ and+ loss_2016 & 2015.xlsx; Hidden Hills Apartnrnts_profit+ and+ loss_T12.xlsx; Hidden Hills 08 August 2017 Rent Roll.pdf (NATIVES) | HHM-001680 - HHM-001704 | FRE 401, 402, 403 | | X | | X | |
| A0174 | --- | --- | 09/06/2017 | Catherine Tamaro email to Philip Assouad, Ryan Dinius re Couple of documents relating to environmental issues at Hidden Hills Apartments | KIDDER000001 - KIDDER000001 | FRE 401, 402, 403 | | X | | X | |
| A0175 | 0152 | Tamaro | 09/06/2017 | Catherine Tamaro email to Philip Assouad and Ryan Dinius re Couple of documents relating to environmental issues at Hidden Hills Apartments, attaching Environmental Partners Technical Memorandum 2017.08.08 Final.pdf; Confirmed and Suspected Contaminated Sites List Hidden Hills.pdf (See HHM-001281 and HHM-001369 for attachments) | HHM-001280 - HHM-001280 | FRE 401, 402, 403 | | X | | X | |
| A0176 | 0153 | Tamaro | 09/06/2017 | Todd Henderson email to Catherine Tamaro, cc Andy Noble re Hidden Hills 3rd Appraiser | HHM-001393 - HHM-001394 | FRE 401, 402, 403 | | X | | X | |
| A0177 | 0024 | Noble | 09/07/2017 | Andy Noble email forward to Kori Gibbs re Hidden Hills 3rd Appraiser | AMTAXHH00017860 - AMTAXHH00017861 | FRE 401, 402, 403 | | X | | X | |
| A0178 | 0151 | Tamaro | 09/07/2017 | Notes re Broker RFP Questions | HHM-000001 - HHM-000001 | FRE 401, 402, 403 | | X | | X | |
| A0179 | 0154 | Tamaro | 09/07/2017 | Catherine Tamaro email to John Campbell, cc Cory Hutsell Re: Appraisal of Hidden Hills Apartments, University Place | HHM-002436 - HHM-002437 | FRE 401, 402, 403 | | X | | X | |
| A0180 | 0006 | Hutsell | 09/08/2017 | Colliers International Professional Service Agreement signed by Catherine Tamaro | COL00006062 - COL00006062 | FRE 401, 402, 403 | | X | | X | |
| A0181 | 0002 | Hutsell | 09/08/2017 | Colliers International Professional Service Agreement letter to Catherine Tamaro Re: Appraisal of Hidden Hills Apartments | HHM-002338 - HHM-002343 | FRE 401, 402, 403 | | X | | X | |
| A0182 | --- | --- | 09/08/2017 | Colliers International Professional Service Agreement signed by Catherine Tamaro | HHM-002426 - HHM-002426 | FRE 401, 402, 403 | | X | | X | |
| A0183 | 0036 | Carp | 09/13/2017 | Catherine Tamaro email to Brett Carp Re: 73201.1 - Tech Memo | HHM-002269 - HHM-002270 | FRE 401, 402, 403 | | X | | X | |
| A0184 | --- | --- | 09/13/2017 | Catherine Tamaro email to John Campbell, cc Cory Hutsell Re: Appraisal of Hidden Hills Apartments, University Place | HHM-002397 - HHM-002402 | FRE 401, 402, 403 | | X | | X | |
| A0185 | --- | --- | 09/18/2017 | Eric Pettit email to Joseph McCarthy RE: Hidden Hills 2001, LP, attaching Confidential Settlement Communication - HH Sale Distributions.xlsx (Attachment Not Included) | 2 pp. | FRE 401, 402, 403 | | X | | X | |
| A0186 | --- | --- | 09/18/2017 | Catherine Tamaro email to John Campbell, cc Cory Hutsell re Appraisal of Hidden Hills Apartments, University Place | COL_CH-EML_00000062 - COL_CH-EML_00000062 | FRE 401, 402, 403 | | X | | X | |
| A0187 | 0017 | Hutsell | 09/18/2017 | Handwritten notes re John and Greg | COL00007241 - COL00007243 | FRE 401, 402, 403 | | X | | X | |
| A0188 | 0031 | Hutsell | 09/18/2017 | Handwritten notes re Greg, Josh, and Ivan | COL00007244 - COL00007244 | FRE 401, 402, 403 | | X | | X | |
| A0189 | 0009 | Hutsell | 09/18/2017 | Handwritten notes (Hidden Hills Tacoma 9/18/17) | COL00007250 - COL00007251 | FRE 401, 402, 403 | | X | | X | |
| A0190 | 0010 | Hutsell | 09/19/2017 | Catherine Tamaro email to John Campbell, Cory Hutsell Re: Appraisal of Hidden Hills Apartments, University Place | COL_CH-EML_00000072 - COL_CH-EML_00000074 | FRE 401, 402, 403 | | X | | X | |
| A0191 | 0011 | Hutsell | 09/19/2017 | Armand Tiberio email to John Campbell, James Flinn, cc Cory Hutsell RE: Hidden Hills | COL_CH-EML_00000077 - COL_CH-EML_00000078 | FRE 401, 402, 403 | | X | | X | |
| A0192 | --- | --- | 09/19/2017 | Cory Hutsell email to Catherine Tamaro, cc John Campbell RE: Appraisal of Hidden Hills Apartments, University Place | HHM-002467 - HHM-002468 | FRE 401, 402, 403 | | X | | X | |
| A0193 | 0013 | Hutsell | 09/20/2017 | John Campbell email to Cory Hutsell FW: Hidden Hills | COL_CH-EML_00000079 - COL_CH-EML_00000080 | FRE 401, 402, 403 | | X | | X | |
| A0194 | --- | --- | 09/27/2017 | Eric Pettit email to Joseph McCarthy RE: Hidden Hills 3rd Appraiser | 3 pp. | FRE 401, 402, 403 | | X | | X | |

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|----------------|---------------|----------|------------|--|---|------------------------|------------------------|---------------------------------|------------|-----------|--|
| A0195 | 0019 | Hutsell | 10/04/2017 | Catherine Tamaro email to Cory Hutsell, cc John Campbell Re: Appraisal of Hidden Hills Apartments, University Place | COL_CH-EML_00000086 - COL_CH-EML_00000089 | FRE 401, 402, 403 | | X | | X | |
| A0196 | --- | --- | 10/04/2017 | Cory Hutsell email to Catherine Tamaro, cc John Campbell Re: Appraisal of Hidden Hills Apartments, University Place | HHM-002453 - HHM-002457 | FRE 401, 402, 403 | | X | | X | |
| A0197 | 0020 | Hutsell | 10/09/2017 | John Campbell email to Cory Hutsell FW: Tacoma Plume | COL_CH-EML_00000098 - COL_CH-EML_00000100 | FRE 401, 402, 403 | | X | | X | |
| A0198 | 0021 | Hutsell | 10/09/2017 | Cory Hutsell email to Catherine Tamaro, cc John Campbell Re: Appraisal of Hidden Hills Apartments, University Place | COL_CH-EML_00000218 - COL_CH-EML_00000222 | FRE 401, 402, 403 | | X | | X | |
| A0199 | 0022 | Hutsell | 10/11/2017 | Cory Hutsell email to John Campbell re Hidden Hills | COL_CH-EML_00000223 - COL_CH-EML_00000223 | FRE 401, 402, 403 | | X | | X | |
| A0200 | --- | --- | 10/12/2017 | Eric Pettit email to Joseph McCarthy RE: Hidden Hills 3rd Appraiser | 3 pp. | FRE 401, 402, 403 | | X | | X | |
| A0201 | 0023 | Hutsell | 10/13/2017 | Catherine Tamaro email to Cory Hutsell, cc John Campbell Re: Appraisal of Hidden Hills Apartments, University Place | COL_CH-EML_00000101 - COL_CH-EML_00000106 | FRE 401, 402, 403 | | X | | X | |
| A0202 | --- | --- | 10/13/2017 | Catherine Tamaro email to Cory Hutsell, cc John Campbell Re: Appraisal of Hidden Hills Apartments, University Place | HHM-002367 - HHM-002372 | FRE 401, 402, 403 | | X | | X | |
| A0203 | --- | --- | 10/16/2017 | Eric Pettit email to Joseph McCarthy RE: Hidden Hills 3rd Appraiser | 4 pp. | FRE 401, 402, 403 | | X | | X | |
| A0204 | 0030 | Hutsell | 10/19/2017 | Colliers Hidden Hills Apartments Appraisal Report, dated October 19, 2017, Colliers File No. SEA170770; Prepared for: Catherine Tamaro; Prepared by: Colliers International | HHM-001708 - HHM-001942 | FRE 401, 402, 403 | | X | | X | |
| A0205 | --- | --- | 10/19/2017 | Catherine Tamaro email to Cory Hutsell, John Campbell Re: Hidden Hills Appraisal and Invoice | HHM-002579 - HHM-002581 | FRE 401, 402, 403 | | X | | X | |
| A0206 | 0156 | Tamaro | 10/19/2017 | Cory Hutsell email to Catherine Tamaro RE: Appraisal of Hidden Hills Apartments, University Place | HHM-002272 - HHM-002282 | FRE 401, 402, 403 | | X | | X | |
| A0207 | 0032 | Hutsell | 10/20/2017 | John Campbell email to Cory Hutsell RE: Hidden Hills Appraisal and Invoice | COL_CH-EML_00000125 - COL_CH-EML_00000129 | FRE 401, 402, 403 | | X | | X | |
| A0208 | 0033 | Hutsell | 10/22/2017 | Catherine Tamaro email to Cory Hutsell, John Campbell Re: Hidden Hills Appraisal and Invoice | HHM-002576 - HHM-002578 | FRE 401, 402, 403 | | X | | X | |
| A0209 | --- | --- | 10/23/2017 | Cory Hutsell email to Catherine Tamaro RE: Hidden Hills Appraisal and Invoice with attachment (Attachment Not Included) | HHM-002582 - HHM-002586 | FRE 401, 402, 403 | | X | | X | |
| A0210 | 0028 | Hutsell | 10/23/2017 | Colliers International Valuation & Advisory Services Appraisal Report of Hidden Hills Apartments | HHM-002587 - HHM-002819 | FRE 401, 402, 403 | | X | | X | |
| A0211 | 0034 | Hutsell | 10/24/2017 | Catherine Tamaro email to Cory Hutsell Re: Hidden Hills Appraisal and Invoice | HHM-002572 - HHM-002575 | FRE 401, 402, 403 | | X | | X | |
| A0212 | --- | --- | 11/03/2017 | Eric Pettit letter to Joseph McCarthy re Hidden Hills 2001, LP in response to McCarthy's emails of October 23, 2017 | AMTAXHH00017821 - AMTAXHH00017827 | FRE 401, 402, 403 | | X | | X | |
| A0213 | --- | --- | 11/07/2017 | Brett Carp email to Catherine Tamaro Re: 73201.1 - Tech Memo & Referrals | HHM-002252 - HHM-002255 | FRE 401, 402, 403 | | X | | X | |
| A0214 | --- | --- | 11/08/2017 | Joseph McCarthy's letter to Eric Pettit in response to November 3, 2017 letter | AMTAXHH00017817 - AMTAXHH00017817 | FRE 401, 402, 403 | | X | | X | |
| A0215 | 0035 | Hutsell | 11/13/2017 | Catherine Tamaro email to Cory Hutsell Re: Hidden Hills Appraisal and Invoice | COL_CH-EML_00000140 - COL_CH-EML_00000140 | FRE 401, 402, 403 | | X | | X | |
| A0216 | --- | --- | 11/13/2017 | John Campbell email to Cory Hutsell Re: Voice message from STOEL RIVES LLP | COL_CH-EML_00000141 - COL_CH-EML_00000142 | FRE 401, 402, 403 | | X | | X | |
| A0217 | --- | --- | 11/14/2017 | Catherine Tamaro email to Chris Blake re EXTERNAL: Hidden Hills 2001, LP, attaching Catherine Tamaro letter to Chris Blake in response to proposed corrections to spreadsheet calculating the distribution of profits and losses from a sale of the LP's interest in Hidden Hills 2001, LP | AMTAXHH00017828 - AMTAXHH00017831 | FRE 401, 402, 403 | | X | | X | |
| A0218 | --- | --- | 11/17/2017 | Catherine Tamaro email to Cory Hutsell Re: Hidden Hills Appraisal and Invoice | COL_CH-EML_00000145 - COL_CH-EML_00000146 | FRE 401, 402, 403 | | X | | X | |

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|----------------|---------------|----------|------------|--|---|------------------------|------------------------|---------------------------------|------------|-----------|--|
| A0219 | --- | --- | 11/17/2017 | John Campbell email to Cory Hutsell Re: Hidden Hills Appraisal and Invoice | COL_CH-EML_00000147 - COL_CH-EML_00000150 | FRE 401, 402, 403 | | X | | X | |
| A0220 | --- | --- | 11/17/2017 | Cory Hutsell email to Catherine Tamaro RE: Hidden Hills Appraisal and Invoice | COL_CH-EML_00000747 - COL_CH-EML_00000748 | FRE 401, 402, 403 | | X | | X | |
| A0221 | 0027 | Noble | 11/20/2017 | Declaration of Cory J. Hutsell | 5 pp. | FRE 401, 402, 403 | | X | | X | |
| A0222 | --- | --- | 11/30/2017 | Anthony Olivo email to Catherine Tamaro, cc Chris Blake, Joseph McCarthy, Eric Pettit re Hidden Hills 2001, LP, attaching Alison Wadle letter to Catherine Tamaro, cc Chris Blake, Joseph McCarthy, Eric Pettit re Hidden Hills 2001, LP | HHM-001382 - HHM-001392 | FRE 401, 402, 403 | | X | | X | |
| A0223 | -- | -- | 12/05/2017 | Declaration of Catherine Tamaro | 106 pp. | FRE 401, 402, 403 | | X | | X | |
| A0224 | --- | --- | 12/06/2017 | Alison Wadle letter to Catherine Tamaro, cc Chris Blake, Joseph McCarthy, Eric Pettit re Hidden Hills 2001, LP | HHM-002040 - HHM-002041 | FRE 401, 402, 403 | | X | | X | |
| A0225 | 0023 | Blake | 12/13/2017 | Caley Dias email to Christopher Blake, cc Ryan Trane re Parkway | AMTAXHH00020525 - AMTAXHH00020526 | | | X | X | X | |
| A0226 | --- | --- | 12/18/2017 | Catherine Tamaro email to Cory Hutsell, cc John Campbell Re: Hidden Hills Appraisal and Invoice | COL_CH-EML_00000152 - COL_CH-EML_00000154 | FRE 401, 402, 403 | | X | | X | |
| A0227 | 0065 | Tamaro | 01/08/2018 | Catherine Tamaro email to Todd Henderson re Appraisal for Parkway Apartments in Federal Way | HHM-014080PW - HHM-014081PW | | | X | X | X | |
| A0228 | -- | -- | 01/12/2018 | AMTAX's First Set of Requests for Production to Plaintiff/Counter-Defendant | 16 pp. | | | X | X | X | |
| A0229 | -- | -- | 01/12/2018 | AMTAX's First Set of Requests for Admission to Plaintiff and Counter-Defendant | 9 pp. | | | X | X | X | |
| A0230 | -- | -- | 01/12/2018 | AMTAX's First Set of Interrogatories to Plaintiff/Counter-Defendant | 9 pp. | | | X | X | X | |
| A0231 | 0066 | Tamaro | 01/19/2018 | Catherine Tamaro email to Todd Henderson re Cost of completing the siding at Parkway | HHM-014083PW - HHM-014083PW | | | X | X | X | |
| A0232 | --- | --- | 01/25/2018 | Laura Lindal email to Catherine Tamaro, cc Carol Prince Re: Parkway adjustment | LC00000738 - LC00000738 | | | X | X | X | |
| A0233 | --- | --- | 01/28/2018 | Laura Lindal email to Catherine Tamaro, cc Carol Prince re Parkway audit - draft | LC00000561 - LC00000563 | | | X | X | X | |
| A0234 | 0068 | Tamaro | 01/31/2018 | Heather Elliott email to Catherine Tamaro re Parkway Apartments appraisal report | HHM-013913PW - HHM-013913PW | | | X | X | X | |
| A0235 | 0069 | Tamaro | 01/31/2018 | CBRE Appraisal Report of Parkway Apartments | HHM-013914PW - HHM-014042PW | | | X | X | X | |
| A0236 | --- | --- | 01/31/2018 | Laura Lindal email to Catherine Tamaro FW: Parkway audit - draft | LC00000523 - LC00000524 | | | X | X | X | |
| A0237 | 0070 | Tamaro | 02/04/2018 | Catherine Tamaro email to Heather Elliott, Todd Henderson re Parkway Apartments appraisal report | HHM-014216PW - HHM-014216PW | | | X | X | X | |
| A0238 | --- | --- | 02/04/2018 | Parkway Apartments, LP Profit and Loss | HHM-014220PW - HHM-014220PW | | | X | X | X | |
| A0239 | -- | -- | 02/12/2018 | Plaintiff's Responses and Objections to Defendant's First Set of Interrogatories (with verification) | 13 pp. | FRE 401, 402, 403 | | X | | X | |
| A0240 | -- | -- | 02/12/2018 | Plaintiff's Responses and Objections to Defendant's First Set of Requests for Production | 14 pp. | FRE 401, 402, 403 | | X | | X | |
| A0241 | -- | -- | 02/12/2018 | Amtax's Responses and Objections to HHM's First Set of Requests for Admission, Interrogatories, and Requests for Production | 32 pp. | | | X | X | X | |
| A0242 | -- | -- | 02/12/2018 | Plaintiff's Responses and Objections to Defendant's First Set of Requests for Admission | 9 pp. | FRE 401, 402, 403 | | X | | X | |
| A0243 | --- | --- | 02/16/2018 | Catherine Tamaro email to Brett Carp Re: 73201.1 - Tech Memo & Referrals | EPI_EML_00001250 - EPI_EML_00001252 | FRE 401, 402, 403 | | X | | X | |
| A0244 | --- | --- | 03/15/2018 | Laura Lindal email to Catherine Tamaro FW: Parkway Apartments, LP, attaching 334th Place 2001 Mindspring Letter re Parkway Apartments - 5.8.18.pdf | LC00000472 - LC00000476 | | | X | X | X | |
| A0245 | --- | --- | 03/15/2018 | Catherine Tamaro email to Gary Squires Re: Parkway Apartments LP | SM00006230 - SM00006231 | | | X | X | X | |

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|----------------|---------------|----------|------------|---|-----------------------------------|------------------------|------------------------|---------------------------------|------------|-----------|--|
| A0246 | --- | --- | 04/02/2018 | Catherine Tamaro email to Gary Squires Re: Parkway | SM00006219 - SM00006219 | | | X | X | X | |
| A0247 | -- | -- | 04/05/2018 | Plaintiff's Amended Initial Disclosures | 7 pp. | | | X | X | X | |
| A0248 | --- | --- | 04/05/2018 | Adam Schurle email to Gary Squires, cc Catherine Tamaro re Catherine Tamaro and Parkway Apartments, LP tax return [S-R.0009368.00003], attaching Parkway tax return 2017 - DRAFT.pdf | SM00004160 - SM00004161 | | | X | X | X | |
| A0249 | --- | --- | 05/08/2018 | Anthony Olivo email to Catherine Tamaro, cc Eric Pettit, Alison Wadle, Chris Blake re Parkway Apartments, LP, attaching Alison Wadle letter to Catherine Tamaro re Parkway Apartments, LP | AMTAXHH00021609 - AMTAXHH00021613 | | | X | X | X | |
| A0250 | 0009 | Blake | 05/10/2018 | Novogradac & Company LLP Appraisal Report of Parkway Apartments | AMTAXHH00043597 - AMTAXHH00043755 | | | X | X | X | |
| A0251 | --- | --- | 05/16/2018 | Email from Sonia Mejia to Scott Pritchard, cc Alison Wadle, Christopher Blake, Eric Pettit, Christopher Caldwell re Parkway Apartments, LP (the "Partnership"), attaching 5/6/18 Eric Pettit letter to Scott Pritchard, cc Alison Wadle, Chris Blake re Parkway Apartments, LP | AMTAXHH00021477 - AMTAXHH00021479 | | | X | X | X | |
| A0252 | 0073 | Tamaro | 06/13/2018 | Kari Bohag email to Catherine Tamaro re Bed bug heat treatments | HHM-014616PW - HHM-014616PW | | | X | X | X | |
| A0253 | --- | --- | 07/02/2018 | Alison Wadle letter to Catherine Tamaro, cc Chris Blake, Eric Pettit re Parkway Apartments, LP | AMTAXHH00021659 - AMTAXHH00021661 | | | X | X | X | |
| A0254 | -- | -- | 09/13/2018 | Amtax Holdings 169, LLC's First Set of Interrogatories to 334th Place 2001, LP | 11 pp. | | | X | X | X | |
| A0255 | -- | -- | 09/13/2018 | Amtax Holdings 169, LLC's First Set of Requests for Admission to 334th Place 2001, LLC | 12 pp. | | | X | X | X | |
| A0256 | -- | -- | 09/13/2018 | Amtax Holdings 169, LLC's First Set of Requests for Production to 334th Place 2001, LLC | 15 pp. | | | X | X | X | |
| A0257 | --- | --- | 09/21/2018 | Catherine Tamaro email to John Maddux, cc Gary Squires Re: HUD Allowed Book Keeping Fees | SM00006207 - SM00006208 | | | X | X | X | |
| A0258 | --- | --- | 09/21/2018 | Catherine Tamaro email to John Maddux, cc Gary Squires Re: HUD Allowed Book Keeping Fees | SM00006209 - SM00006210 | | | X | X | X | |
| A0259 | --- | --- | 09/23/2018 | Catherine Tamaro email to John Maddux, cc Gary Squires re Pertinent Parkway audit notes | SM00006196 - SM00006196 | | | X | X | X | |
| A0260 | --- | --- | 09/24/2018 | Catherine Tamaro email to John Maddux, cc Gary Squires Re: Pertinent Parkway audit notes, attaching Parkway Apartments Profit and Loss 2011-2013 (NATIVE) | SM00006233 - SM00006239 | | | X | X | X | |
| A0261 | --- | --- | 09/24/2018 | Catherine Tamaro email to John Maddux, cc Gary Squires Re: Pertinent Parkway audit notes, attaching Parkway+Apartments%2C+ LP_ Transaction+ Report-5.xlsx; Parkway+Apartments%2C+ LP _Transaction+ Report-4.xlsx; Parkway+Apartments%2C+ LP _Transaction+ Report-3.xlsx (NATIVES) | SM00006240 - SM00006255 | | | X | X | X | |
| A0262 | 0036 | Tamaro | 10/04/2018 | Notice of Rule 30(b)(6) Deposition of 334th Place 2001,5 pp. LLC | | | | X | X | X | |
| A0263 | 0092 | Tamaro | 10/15/2018 | 334th Place 2001, LLC's Answers and Objections to AMTAX Holdings 169, LLC's First Set of Interrogatories | 15 pp. | | | X | X | X | |
| A0264 | -- | -- | 10/15/2018 | 334th Place 2001, LLC's Responses and Objections to Amtax Holdings 169, LLC's First Set of Requests for Admission | 11 pp. | | | X | X | X | |
| A0265 | -- | -- | 10/15/2018 | 334th Place 2001, LLC's Responses and Objections to Amtax Holdings 169, LLC's First Set of Requests for Production | 15 pp. | | | X | X | X | |
| A0266 | -- | -- | 10/26/2018 | Amtax Holdings 114, LLC Second Set of Requests for Production to Plaintiff/Counter-Defendant Hidden Hills Management. LLC | 10 pp. | FRE 401, 402, 403 | | X | | X | |

| Trial Exh. No. | Depo Exh. No. | Deponent | Doc. Date | Document Description | Document No(s). | Plaintiffs' Objections | Defendants' Objections | Confidential Designation Waived | Admissible | Authentic | Dispute Authenticity and Admissibility |
|----------------|---------------|----------------|------------|--|-----------------------------------|------------------------|------------------------|---------------------------------|------------|-----------|--|
| A0267 | -- | -- | 10/26/2018 | Amtax Holdings 114, LLC Second Set of Requests for Admission to Plaintiff/Counter-Defendant Hidden Hills Management. LLC | 5 pp. | FRE 401, 402, 403 | | X | | X | |
| A0268 | -- | -- | 10/26/2018 | Amtax Holdings 114, LLC Second Set of Interrogatories to Plaintiff/Counter-Defendant Hidden Hills Management. LLC | 7 pp. | FRE 401, 402, 403 | | X | | X | |
| A0269 | 0082 | Tamaro | 11/15/2018 | Notice of Continued Rule 30(b)(6) Deposition of 334th Place 2001, LLC | 5 pp. | | | X | X | X | |
| A0270 | 0083 | Tamaro | 11/15/2018 | Notice of Continued Rule 30(b)(6) Deposition of Hidden Hills Management, LLC | 5 pp. | | | X | X | X | |
| A0271 | --- | --- | 11/15/2018 | Catherine Tamaro email to John Maddux re Question about Parkway HUD Submittal for 2012 | SM00007065 - SM00007065 | | | X | X | X | |
| A0272 | --- | --- | 11/15/2018 | Catherine Tamaro email to John Maddux Re: Question about Parkway HUD Submittal for 2012, attaching Parkway+Apartments%2C+ LP_ Transaction+ Report-4.xlsx | SM00007519 - SM00007522 | | | X | X | X | |
| A0273 | --- | --- | 11/15/2018 | Catherine Tamaro email to John Maddux Re: Question about Parkway HUD Submittal for 2012 | SM00007523 - SM00007524 | | | X | X | X | |
| A0274 | --- | --- | 11/15/2018 | Catherine Tamaro email to John Maddux Re: Question about Parkway HUD Submittal for 2012 | SM00007525 - SM00007526 | | | X | X | X | |
| A0275 | -- | -- | 11/26/2018 | Hidden Hills Management, LLC's Responses and Objections to Amtax Holdings 114, LLC's Second Set of Requests for Admission | 4 pp. | FRE 401, 402, 403 | | X | | X | |
| A0276 | -- | -- | 11/26/2018 | Hidden Hills Management, LLC's Responses and Objections to Amtax Holdings 114, LLC's Second Set of Requests for Production | 6 pp. | FRE 401, 402, 403 | | X | | X | |
| A0277 | -- | -- | 11/26/2018 | Hidden Hills Management, LLC's Responses and Objections to Amtax Holdings 114, LLC's Second Set of Interrogatories (with verification) | 7 pp. | FRE 401, 402, 403 | | X | | X | |
| A0278 | 0002 | Krabbenschmidt | 12/14/2018 | Declaration of Jon Krabbenschmidt in Support of Defendants and Counter-Plaintiffs' Opposition to Plaintiff and Counter-Defendant Senior Housin Assistance Group's and Senion Housing Assistance Corporation's Motions for Summary Judgment | 6 pp. | FRE 801, 802, 703, 403 | | X | | X | |
| A0279 | 0001 | Henderson | 12/21/2018 | Notice of Deposition of CBRE, Inc. | 5 pp. | FRE 401, 402, 403 | | X | | X | |
| A0280 | 0001 | Hutsell | 12/21/2018 | Notice of Deposition of Colliers International Valuation & Advisory Services, LLC | 5 pp. | FRE 401, 402, 403 | | X | | X | |
| A0281 | --- | --- | 12/28/2018 | Declaration of J. Scott Pritchard in Support of 334th Place's Motion for Summary Judgment | 5 pp. | FRE 401, 402, 403 | | X | | X | |
| A0282 | 0001 | Krabbenschmidt | 01/07/2019 | Expert Report of Jon E. Krabbenschmidt | 32 pp. | FRE 403 | | X | | X | |
| A0283 | 0001 | Carp | 01/10/2019 | Amended Notice of Deposition of Environmental Partners, Inc. | 5 pp. | FRE 401, 402, 403 | | X | | X | |
| A0284 | 0007 | Barrick | 03/01/2019 | Handwritten Notes | 2 pp. | | | X | | X | |
| A0285 | 0009 | Noble | 00/00/0000 | Andy Noble Handwritten notes re Tacoma plume | CW001868 | FRE 401, 402, 403 | | X | | X | |
| A0286 | 0109 | Tamaro | 00/00/0000 | Handwritten notes re Hidden Hills Environmental | CBRE_000506 - CBRE_000506 | FRE 401, 402, 403 | | X | | X | |
| A0287 | -- | -- | 5/00/1999 | Purchase Agreement between Steven Aterberry and Hidden Hills Apartments Limited Partnership | HHM-008311 - HHM-008340 | | | X | X | X | |
| A0288 | --- | --- | 00/00/0000 | Jon E. Krabbenschmidt Curriculum Vitae | 1 p. | | | X | X | X | |
| A0289 | | | | Withdrawn (Duplicate) | | | | X | X | X | |
| A0290 | 0022 | Noble | 01/01/2002 | Environmental Escrow Agreement among Hidden Hills 2001, LP and Fannie Mae | AMTAXHH00001714 - AMTAXHH00001731 | FRE 401, 402, 403 | | X | | X | |
| A0291 | | | 04/03/2015 | Parkway Distribution Review Spreadsheet | AMTAXHH00043773 - AMTAXHH00043773 | | | X | X | X | |
| A0292 | | | 01/13/2015 | Draft of Fourth Amendment to Amended and Restated Agreement of Limited Partnership of Parkway Apartments, LP | AMTAXHH00021444 - AMTAXHH00021451 | | | X | X | X | |
| A0293 | | | 05/17/2019 | Eric Pettit email to David Goodnight with accompanying attachment | | | | X | X | X | |